

BULKY DOCUMENTS

(Exceeds 300 pages)

Proceeding/Serial No: 92047661

Filed: 12-15-2009

Title: Petitioner's first notice of reliance

Part 1 of 2



Processed by Gloria Braschi

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First-class mail in an envelope addressed to: United States Patent and Trademark Office, Trademark Trial and Appeal Board, P.O. Box 1451, Alexandria, Virginia 22313-1451 on the date shown below:

Date: December 12, 2009


Norbert Stahl

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

Registration No.: 3147241
For the mark: east13
Date registered: September 26, 2006

Registration No.: 3158549
For the mark: East Thirteen
Date registered: October 17, 2006

LIVE VENTURES INC.

PETITIONER,

v.

SAROJ INTERNATIONAL, INC.

REGISTRANT.

76/632,663
CANCELLATION No. 92047661

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

PETITIONER'S FIRST NOTICE OF RELIANCE.



12-15-2009

Petitioner Live Ventures Inc. ("Petitioner" or "Live Ventures") hereby submits this Notice of Reliance under 37 C.F.R. § 2.120(e) for the following:

- Exhibit A - Record of Maine Department of the Secretary of State for Live Ventures, Inc. showing assumed name "e thirteen, inc." and a filing date of 12/01/2004. Page(s): all pages submitted (1-2). The exhibit is relevant to the issue of use of the mark e thirteen by Petitioner.**
- Exhibit B - Certification of the State of Maine, Department of the Secretary of State for Live Ventures, Inc. certifying December 1, 2004 as the date of incorporation and filing of assumed names. Page(s): all pages submitted (1-2). The exhibit is relevant to the issue of use of the mark e thirteen by Petitioner.**
- Exhibit C - Certificate of Registration of the Commonwealth of Massachusetts for Live Ventures, Inc. showing December 1, 2004 as the date of incorporation and "Sale and marketing of bicycles" as activities conducted by Live Ventures. Page(s): all pages submitted (1-5). The exhibit is relevant to the issue of use of the mark e thirteen by Petitioner.**
- Exhibit D - Business Certificate of the Commonwealth of Massachusetts, Town of Edgartown for Live Ventures, Inc. showing a dba of "e thirteen components" and "e13 components". Page(s): all pages submitted (1-2). The exhibit is relevant to the issue of use of the mark e thirteen by Petitioner.**
- Exhibit E - Printed publication entitled "Mountain Bike Action", issue January 2003. Page(s): all pages submitted (including the cover and pages numbered 85, 86, 90). The exhibit is relevant to the issue of use of the mark e thirteen by Petitioner.**
- Exhibit F - Printed publication entitled "litter "mega"zine", issue August 2003. Page(s): all pages submitted. The exhibit is relevant to the issue of use of the mark e thirteen by Petitioner.**
- Exhibit G - Publication entitled "Pinkbike.com", published October**

30,2003. Page(s): all pages submitted. The exhibit is relevant to the issue of use of the mark e thirteen by Petitioner.

Live Ventures hereby submits this Notice of Reliance under 37 C.F.R. § 2.120(j)

for the following:

- Exhibit H - Petitioner's First Set of Interrogatories to Registrant Saroj International
- Exhibit I - Registrant Saroj International, Inc.'s First Supplemental Response to Petitioner's First Set of Interrogatories
- Exhibit J - Registrant Saroj International, Inc.'s Second Supplemental Response to Petitioner's First Set of Interrogatories
- Exhibit K - Petitioner's First Set of Requests for Production of Documents and Things to Registrant Saroj International
- Exhibit L - Registrant Saroj International, Inc.'s First Supplemental Response to Petitioner's First Set of Requests for Production of Documents and Things
- Exhibit M - Registrant Saroj International, Inc.'s Second Supplemental Response to Petitioner's First Set of Requests for Production of Documents and Things
- Exhibit N - Petitioner's First Set of Requests for Admissions to Registrant Saroj International
- Exhibit O - Registrant Saroj International, Inc.'s First Supplemental Response to Petitioner's First Set of Requests for Admissions
- Exhibit P - Registrant Saroj International, Inc.'s Second Supplemental Response to Petitioner's First Set of Requests for Admissions
- Exhibit Q - Petitioner's Second Set of Interrogatories to Registrant Saroj International
- Exhibit R - Registrant Saroj International, Inc.'s Response to Petitioner's

Second Set of Interrogatories

- Exhibit S - Petitioner's Second Set of Requests for Production of Documents and Things to Registrant Saroj International
- Exhibit T - Registrant Saroj International, Inc.'s Response to Petitioner's Second Set of Requests for Production of Documents and Things
- Exhibit U - Petitioner's Second Set of Requests for Admissions to Registrant Saroj International
- Exhibit V - Registrant Saroj International, Inc.'s Response to Petitioner's Second Set of Requests for Admissions

Respectfully submitted,

Stahl Law Firm

Date: December 12, 2009



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S FIRST NOTICE OF RELIANCE, including all Exhibits, has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on December 12, 2009, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 401 West "A" Street, Suite 1785, San Diego, California 92101.

Date: December 12, 2009

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

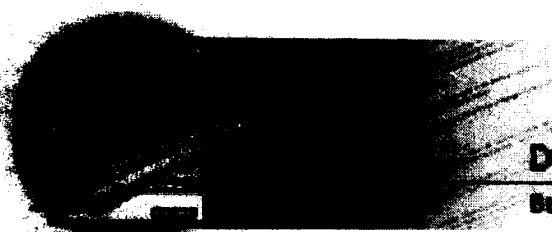
Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT A

**MAINE****Department of the Secretary of State****Bureau of Corporations, Elections and Commissions**

Information Summary

Subscriber activity report

This record contains information from the CEC database and is accurate as of: Sat Dec 12 2009 14:17:19. Please print or save for your records.

Legal Name	Charter Number	Filing Type	Status
LIVE VENTURES, INC.	20050995 D	BUSINESS CORPORATION	GOOD STANDING

Filing Date	Expiration Date	Jurisdiction
12/01/2004	N/A	MAINE

Other Names (A=Assumed ; F=Former)

EVIL BIKES, INC. A

E THIRTEEN, INC. A

Clerk/Registered Agent

DAVID WEAGLE
18 BAKERS GRANT ROAD
EAST LEBANON, ME 04027

[Back to previous screen](#)[New Search](#)

Click on a link to obtain additional information.

[List of Filings](#)[View list of filings](#)

Obtain additional information:

[Certificate of Existence \(more info\)](#)

<u>Short Form without</u> <u>amendments</u>	<u>Long Form with</u> <u>amendments</u>
<u>(\$30.00)</u>	<u>(\$30.00)</u>

You will need Adobe Acrobat version 3.0 or higher in order to view PDF files.
If you encounter problems, visit the [troubleshooting page](#).



If you encounter technical difficulties while using these services, please contact the [Webmaster](#). If you are unable to find the information you need through the resources provided on this web site, please contact the Bureau's Reporting and Information Section at 207-624-7752 or [e-mail](#) or visit our [Feedback](#) page.

© Department of the Secretary of State

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT B

State of Maine



Department of the Secretary of State

I, the Secretary of State of Maine, certify that according to the provisions of the Constitution and Laws of the State of Maine, the Department of the Secretary of State is the legal custodian of the Great Seal of the State of Maine which is hereunto affixed and of the reports of organization, amendment and dissolution of corporations and annual reports filed by the same.

I further certify that LIVE VENTURES, INC. is a duly organized business corporation under the laws of the State of Maine and that the date of incorporation is December 01, 2004.

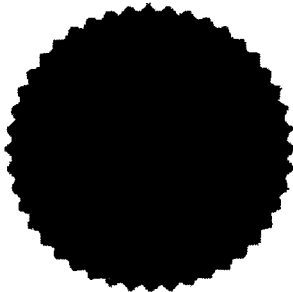
I further certify that on:

December 01, 2004	ASSUMED NAME was filed.
December 01, 2004	ASSUMED NAME was filed.
December 01, 2004	ARTICLES OF INCORPORATION were filed.
August 07, 2006	CHANGE OF CLERK AND REGISTERED OFFICE was filed.

No further amendments have been filed to date.

I further certify that said business corporation has filed annual reports due to this Department, and that no action is now pending by or on behalf of the State of Maine to forfeit the charter and that according to the records in the Department of the Secretary of State, said corporation is a legally existing business corporation in good standing under the laws of the State of Maine at the present time.

In testimony whereof, I have caused the Great Seal of the State of Maine to be hereunto affixed. Given under my hand at Augusta, Maine, this eleventh day of December 2009.



A handwritten signature in black ink, appearing to read "Matthew Dunlap", written over a horizontal line.

MATTHEW DUNLAP

Secretary of State

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT C

**F
FPC**

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

Foreign Corporation
Certificate of Registration
(General Laws, Chapter 156D, Section 15.03; 950 CMR 113.48)

FORM MUST BE TYPED

- (1) Exact name of the corporation, including any words or abbreviations indicating incorporation:

Live Ventures, Inc.

- (2) Name under which the corporation will transact business in the commonwealth that satisfies the requirements of G.L. Chapter 156D, Section 15.06:

Live Ventures, Inc.

If applicable, please attach:

- an agreement to refrain from use of the unavailable name in the commonwealth; and
- a copy of the doing business certificate filed in the city or town where it maintains its registered office; and
- a copy of the resolution of the corporation's board of directors, certified by its secretary, the name under which the corporation will transact business in the commonwealth pursuant to 950 CMR 113.50(4).

- (3) Jurisdiction of incorporation: Maine

Date of incorporation: December 1, 2004 Duration if not perpetual: _____
(month, day, year)

- (4) Street address of principal office: 18 Bakers Grant Rd., East Lebanon, ME 04027

(number, street, city or town, state, zip code)

- (5) Street address of registered office in the commonwealth: 11 Bold's Farm Road, Edgartown, MA 02539

(number, street, city or town, state, zip code)

Name of registered agent in the commonwealth at the above address: David Weagle

I, David Weagle

registered agent of the above corporation consent to my appointment as registered agent pursuant to G. L. Chapter 156D, Section 5.02.*

* Or attach registered agent's consent hereto.

(6) Fiscal year end: 12/31

(month, day)

(7) Brief description of the corporation's activities to be conducted in the commonwealth:

Sale and marketing of bicycles.


(8) Names and business addresses of its current officers and directors:

	NAME	BUSINESS ADDRESS
President:	David Weagle	11 Boldt's Farm Road, Edgartown, MA 02539
Vice-president:		
Treasurer:	David Weagle	11 Boldt's Farm Road, Edgartown, MA 02539
Secretary:	David Weagle	11 Boldt's Farm Road, Edgartown, MA 02539
Assistant secretary:		
Director(s):	David Weagle	11 Boldt's Farm Road, Edgartown, MA 02539

Attach certificate of legal existence or a certificate of good standing issued by an officer or agency properly authorized in the jurisdiction of organization. If the certificate is in a foreign language, a translation thereof under oath of the translator shall be attached.

This certificate is effective at the time and on the date approved by the Division, unless a later effective date not more than 90 days from the date of filing is specified: _____

Signed by: _____



(signature of authorized individual)

- ☐ Chairman of the board of directors,
- ☒ President,
- ☐ Other officer,
- ☐ Court-appointed fiduciary,

on this 23rd day of April 2007

State of Maine



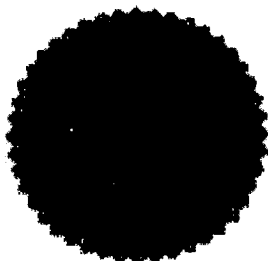
Department of the Secretary of State

I, the Secretary of State of Maine, certify that according to the provisions of the Constitution and Laws of the State of Maine, the Department of the Secretary of State is the legal custodian of the Great Seal of the State of Maine which is hereunto affixed and of the reports of organization, amendment and dissolution of corporations and annual reports filed by the same.

I further certify that LIVE VENTURES, INC. is a duly organized business corporation under the laws of the State of Maine and that the date of incorporation is December 01, 2004.

I further certify that said business corporation has filed annual reports due to this Department, and that no action is now pending by or on behalf of the State of Maine to forfeit the charter and that according to the records in the Department of the Secretary of State, said corporation is a legally existing business corporation in good standing under the laws of the State of Maine at the present time.

In testimony whereof, I have caused the Great Seal of the State of Maine to be hereunto affixed. Given under my hand at Augusta, Maine, this twenty-third day of April 2007.



A handwritten signature in black ink, appearing to read "Matthew Dunlap".

MATTHEW DUNLAP

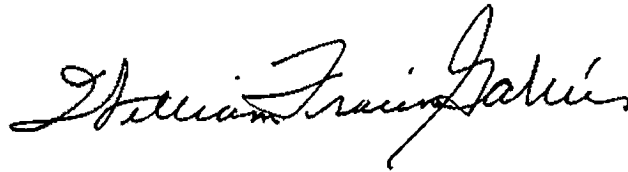
Secretary of State

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are

deemed to have been filed with me on:

April 23, 2007 10:05 AM

A handwritten signature in cursive script, reading "William Francis Galvin".

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT D

THE COMMONWEALTH OF MASSACHUSETTS
TOWN OF EDGARTOWN

BUSINESS CERTIFICATE

FILED August 11, 2008

Fee Paid \$20.00

EXPIRED August 11, 2012

In conformity with the provisions of Chapter 110, Section 5 of the General Laws, as amended, the undersigned hereby declare (s) that a business under the title of

Name of Business Live Ventures Inc. d.b.a. e.thirteen components

Location 11 Boldt Farm Rd. Edgar town, Massachusetts d.b.a. e13 components

Mailing Address P.O. Box 2724, Edgar town Business Telephone (508) 627-5913

is conducted by the following named person: (s).

1. Name (Printed) David Weagle Signature [Signature]

Home Address 11 Boldt Farm Rd. Edgar town MA 02539
Street Town State Zip

Mailing Address P.O. Box 2724 Home Telephone (508) 627-5913

2. Name (Printed) Linley Dolby Signature [Signature]

Home Address 11 Boldt Farm Rd. Edgar town MA 02539
Street Town State Zip

Mailing Address P.O. Box 2724 Home Telephone (508) 627-5913

THE COMMONWEALTH OF MASSACHUSETTS

Dated at

August 11, 2008

Personally appeared before me the above named:

1. David Weagle

[Signature]
Signature

2. Linley Dolby
and made oath that the foregoing statement is true.

Assistant
Title: Clerk or Notary

A certificate issued in accordance with this section shall be in force and effect for four years from the date of issue and shall be renewed for each four years thereafter so long as such business shall be conducted.

My Commission Expires

_____ 20 _____

The following information is for the use of the Edgartown Police Department in the event of an emergency.
Please notify them of any changes in this information:

DAVID WEAGLE PO BOX 2724 508 627 5113
Name Address Telephone Number

I certify under penalties of perjury that I, to my best knowledge and belief, have filed all state tax returns and paid all state taxes required under the law.

David Weagle
Signature of Individual:

David Weagle
By: Business Owner

113 554473
Social Security Number

2-199 2503
Federal Identification Number

This license will not be issued unless the certification clause is signed by the applicant.

Your social security number will be furnished to the Massachusetts Department of Revenue to determine whether you have met tax filing or tax payment obligations. Licensees who fail to correct their non-filing or delinquency will be subject to license suspension or revocation.
This request is made under the authority of Massachusetts General Law C.62C S. 49A.

Edgartown, Massachusetts August 11 2008 at 10:01 o'clock and A M.
recorded and entered with records in Town Clerk's Office.

Book 14B Page 1608

Attest [Signature]
Assistant Town Clerk

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT E

MOUNTAINBIKE

\$3.98

012



70989 37199



The Be One Downhill Team Pro

Unless you're from the Netherlands, or closely follow the World Cup circuit, there's a very good chance that you've never heard of Be One bicycles. Although they are a major player in Europe, they have only been imported to America in the bike bags of traveling professional downhill racers.

Be One has one of the strongest World Cup race teams ever to grace the prestigious UCI series. BMX legend and Lds Gets 4X winner Bas Debever has been a long-time team rider. Bas and teammate Mickael Pascal have been successfully campaigning versions of Be One downhill bikes since 1991.

The Be One brand was recently picked up by World Wide Distribution. They will bring Be One to America and have already campaigned a squad of up-and-coming downhill talent on the East Coast. The Be One won at the infamous Plattekill race series, proving that it can compete at tough, technical local events, in addition to its proven international race pedigree.

THE PARKING LOT BUZZ

The Be One downhill bike doesn't look like anything else being unloaded from car racks and pickup beds at

local downhill events. Rolling into the parking lot of your local ski area with a Be One will cause more than a few necks to snap back. The bike's body is painted a loud mango orange, with the rest of the frame getting black paint or anodizing. Both the single main tube that gives the bike a ton of standover height and the removable seatmast with a slack, fifty-five degree angle make for a very open, airy cockpit. The Be One is actually a simple single-pivot bike. Two large links on the frame drive the shock. The rear hub has extra wide 165mm spacing and a 12mm axle. It adds to the already overbuilt-looking swingarm. A cleanly designed bolt-on hanger holds on the SRAM X.0 derailleur. A close inspection reveals the bottom bracket is 100mm to mate with the rear end. The headtube uses an overbuilt Zero-stack headset standard. It doesn't look like there is much chance of flaring a headtube on this bike.

WHAT BAS WOULD DO

A major feature of the Team Downhill bike is the adjustable travel. There are three different positions that give the bike either 7, 7.5 or 8 inches of travel without changing the frame geometry. We ran the shock in the 7.5-



Ready-to-ride: The unique and somewhat strange-looking Be One Team Downhill bike is a proven World Cup competitor. Now with better availability in the States, expect to see more Be Ones at a downhill near you.



Stronger hub: The 165mm spacing of the rear hub isn't big, it's huge. This spacing is complemented by a wide bottom bracket to help reduce or eliminate chainline problems. This hub creates a stronger, no-disk wheel and helps make the back stiffer.

Seat is strong: Nothing sells corners like a bike with a low bottom bracket. The only compromise to this strong base is to be more conscious of keeping their feet level through tight rocky sections, corners and drop-ins.

inch position during our testing because we felt that the bike rode best (and the shock was valved for) the ten percent rising rate you get in this mounting position. It also matched the seven inches of travel we were getting from the Manitou Dorado fork.

Pedaling: The Be One's super wide bottom bracket spacing would be unacceptable to trail riders (they would feel bowlegged), but downhillers like it this way (or at least are less bothered by the spread). The wide berth gives the Be One a near perfect chainline. In turn, the SRAM drivetrain never missed a shift or skipped a cog in harsh conditions or under power.

Smaller riders will want to run their seat down an inch or two. Because of the slack seat mast angle, extending the seatpost effectively increases the length of the top tube. To get close to our normal seat height, we ran the THE Connix seat all of the way forward in the rails.

Riders had to pay attention to their pedal strokes because of the low bottom bracket height (even though our Be One was spec'd with short Truvativ 165mm Holzfeller cranks). The best way to get the Be One up to race speed was to use quick bursts of leg speed and stay off of the brakes (a tried and true way to win races in any class).

This is our first test of the E13 SRS (Single Ring Security) chainguide. Its most prominent feature is a thick polycarbonate bashguard. We went out of our way to beat it up. Besides the normal abuse from dropping into rock-lined steep chutes, we even fully cased a front-wheel-high log to avoid a downed rider. No matter how many times we hit the outer plate, it stayed straight and never showed any signs of cracking, chipping or failure. The SRS earned major bonus points because it's the quietest working guide we've ridden to date, regardless of your gear combination.

Cornering: This is the strongest point of the Be One downhill design. The low, fourteen-inch bottom bracket, together with the extra-wide, stiff ISIS spindle and 165mm hub spacing, make the bike corner like it is on rails. The shock and most of the frame weight is kept low in the center of the frame. This begs riders to let off the brakes and lean the bike to extreme angles. The stiffness of the rear end

allowed testers to carve harder and pump more frequently in tight single-track. When you got in trouble and had to muscle the bike around, the added stiffness and stability instantly made the bike react to your corrections. The integrated stem on the Dorado fork added to the precise steering.

Braking: It's hard to complain about Hayes hydraulic brakes. The eight-inch rotors effortlessly brought the bike down from high speeds. The Maxxis Slow Reezay tires wore pretty fast (like most race tires), but their excellent grip helped to immediately shave unwanted speed. With a little feathering of the brake, the rear-specific tires seemed to find traction in every condition.

The Be One did exhibit some brake jacking. The active initial travel allowed the bike to bite through a drift corner, but would loosen its jaw as soon as you got on the brakes. The suspension's linkages minimized the stiffening effect on the shock but did not eliminate it. How? The spring rate increases under braking, but the suspension wouldn't extend, unlike most single-pivot designs. This eliminated the catapulting feeling that scares some riders away from single-pivot bikes without a floating brake. Like all of the best World Cup rigs, the best way to ride this bike fast is to stay off of the brakes entirely if you have the skill to keep the bike reigned in.

Descending: There's a theory that a high front end makes steep descents easier. While this may be true in a freeride setting, where your speed doesn't matter, you'd be hard pressed to find a bike on the World Cup circuit that isn't evenly balanced front to back. The Be One adopted a racy low front end with a Zero-stack headset and flat Dorado fork crown. In the hands of an experienced pilot, this will always be the best way to carry more speed down the hill and make quick, crucial corrections. Serious racers should definitely keep this in mind when they're looking at next year's frame.

The low pivot behind the bottom bracket causes the Be One to excel under fast square-edged hits. It carries speed, but absorbs enough of the harsh hit for you to stay in control and look forward to the next hit in the trail.

Technical: The roomy cockpit lets riders finesse the bike through tight tech sections. By running the seat forward, we were able to steer with our

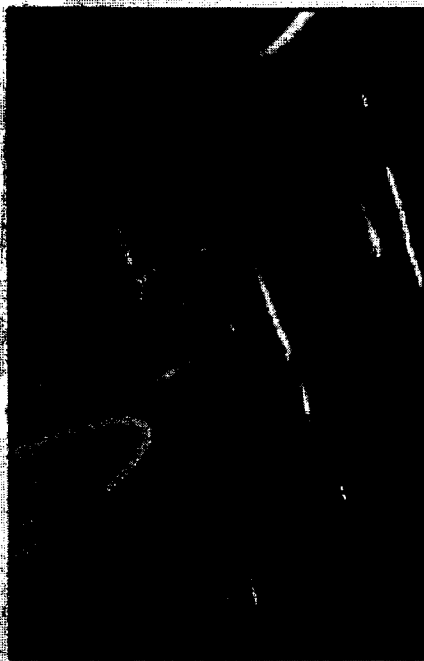


Rocky frame: The Fox Vanilla RC is crammed between an aluminum subframe that allows the weight of the shock to be carried low in the frame, while giving the linkages plenty of room to articulate.

knees despite the top tube. At speed, the Be One inspired confidence. After a few runs, riders were sailing through entire sections without touching their brakes. The low front end and slack head angle lets riders aggressively charge into corners with little fear of getting high sided off the bike or blowing the turn.

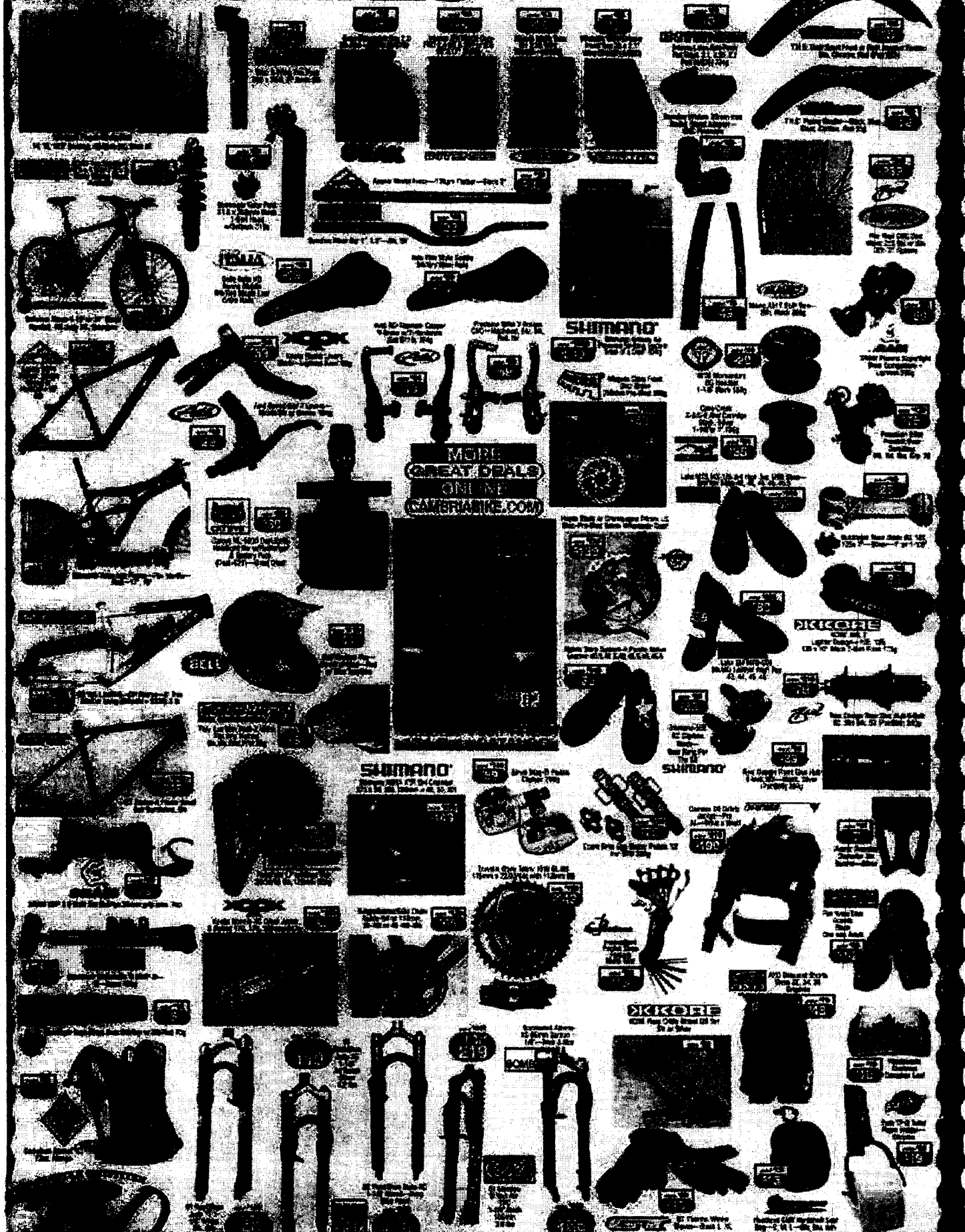
Riders who prefer a design that can be finessed down a race course will appreciate the lively handling attributes of the Be One. Many bikes are coming with shocks brimming with new technology designed to keep your rear wheel on the ground all of the time (Progressive's Fifth Element and Manitou's Stable Platform Valve technology). Still, there's something to be said for a good old rear damper that allows the rider to bunnyhop over obstacles rather than plow into them. The Be One comes with a Fox Vanilla RC that does an adequate job of keeping the rear end on the ground (you can exaggerate this feeling by running a slower rebound setting), but has no qualms about being hopped over a two-foot log in the trail.

Jumping: Switching the Fox Vanilla RC shock back to a faster rebounding setting, the Be One loved to boost off of every lip in sight. The standover clearance lets riders either absorb jumps and keep low or click huge moto whips. The front end reminded us of a motorcycle's. There was plenty of room to move around in order to shift your weight where it needed to be.



At the front: The Be One uses an FSA Zero stack headset. This is the hottest one of the moment. It's a shock absorber that's used in a lot of other bikes. If you can find this head set, it's a great one. It's a great one.

2909 CENTER ST., CAMDEN, CA 95926 INFO@CAMDENMIX.COM FAX 916-323-5744



**MORE
GREAT DEALS
ONLINE
CAMERIANBIKE.COM**

www.briabike.com

ADRENALINE BIKES

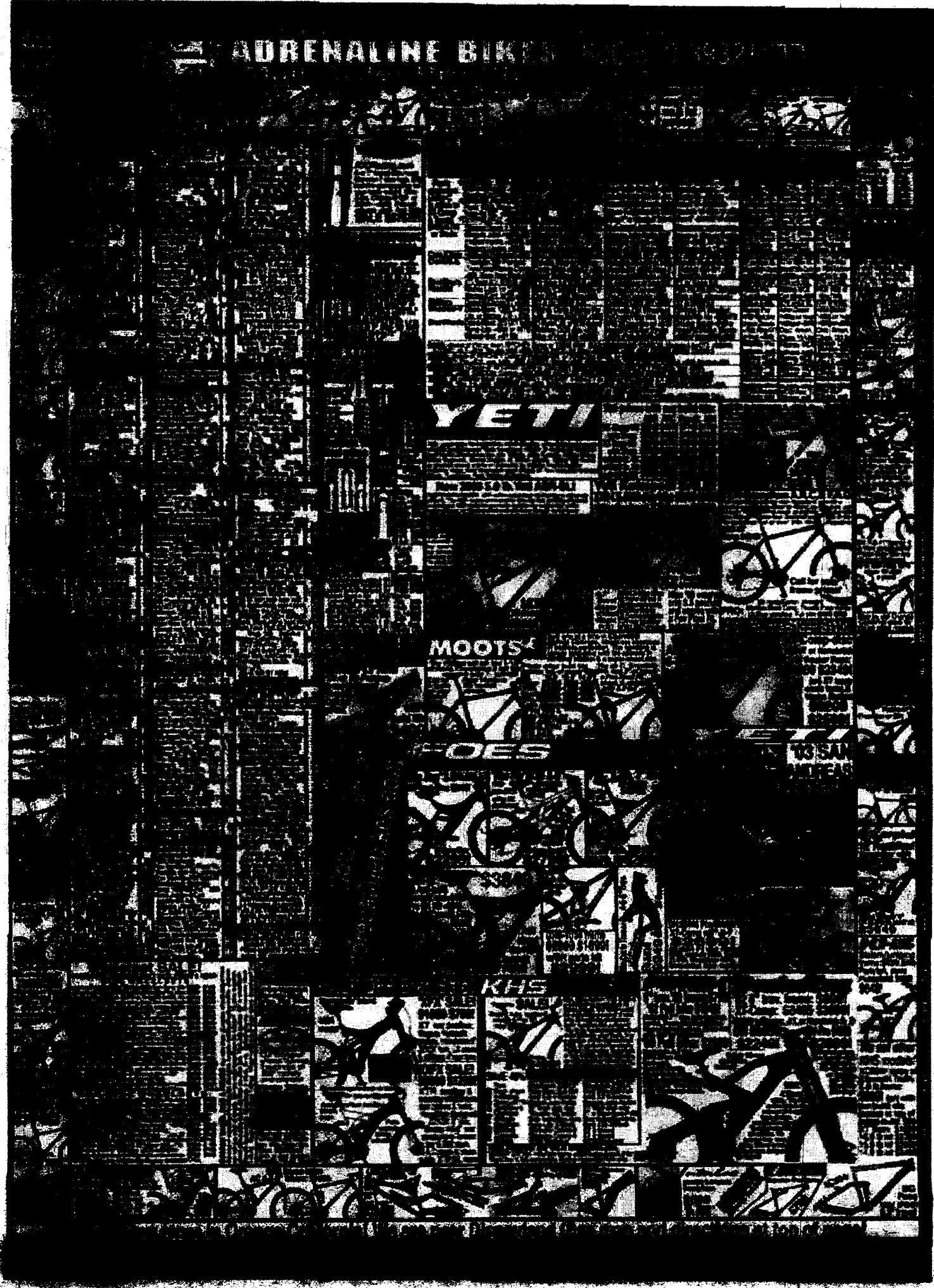
YETI

MOOTS

FOES

KHE

**TS SAN
MINEAS**



CERNE

Reference Book

For more information on the
Cerene family, visit our website
for complete alignment.

Cerene Key 200 MTB Shim 3180

Cerene Key 200

Cerene Key 200

Cerene Key 200



IT IS THE BEST IN PERFORMANCE ITALIAN FOOTWEAR

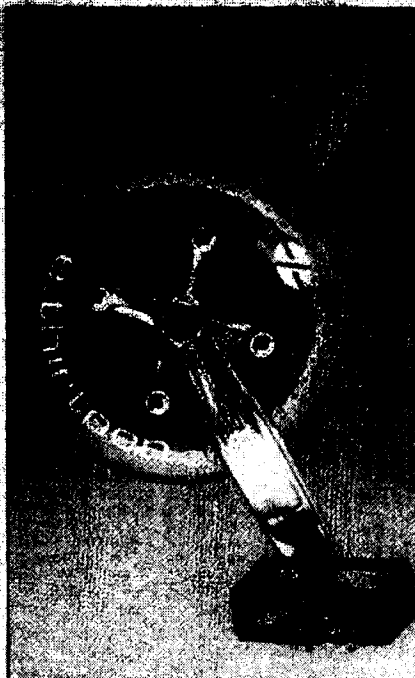
For more information on the Cerene family, visit our website for complete alignment.

Big drops: Remember, this is a full-blown race bike. That doesn't mean that it can't handle big stunts, but you're not going to want to go around wheelie dropping the Be One. To take advantage of the bike, you'll want to hit drops at speed. The low front end makes it easy to move around in the air and it comes up with only a minor tug on the handlebar. The widely spaced rear end and bottom bracket give you a stable platform that definitely helps you to stomp your landings. The broader stance at the pedals is something that you're going to see a lot more of on newer designs this year.

THAT WIDE FEEL

The wide bottom bracket spacing didn't generate any negative response when evaluating pedaling efficiency, but riders had to be ultra conscious of clipping pedals on trail obstacles because of its height. Rocks that had caused no concern while on our Giant DH test sled were now coming into contact with the Be One's pedals. There were more than a few occasions when casing a rock at speed would have us skipping off line.

You can look at this quirk as an acceptable trade-off for a low bottom bracket height that helps the Be One corner. It is a personality trait that you



Strong guidance: The E13 SRS chainguide worked flawlessly. We locked it repeatedly only to scuff the thick polycarbonate outer ring.

either adapt your riding style to fit or you look for a different bike.

One more gripe was that the right-side grip constantly inched its way closer to coming off of the handlebar. If you're going to run twist shifters, make sure to run a short, lock-on style grip.

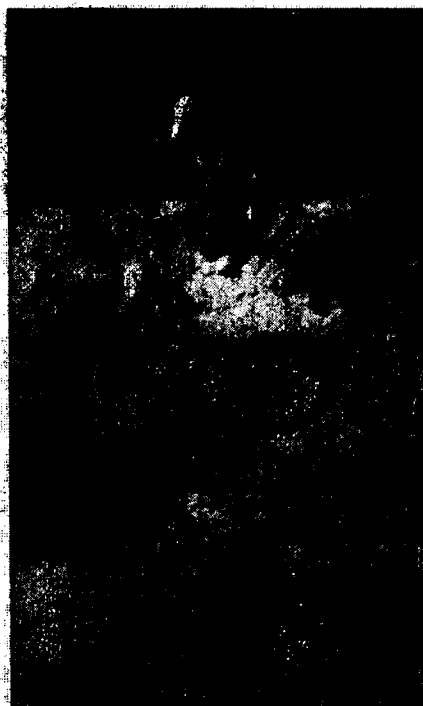
IS THE BE ONE THE ONE?

We loved the way that the Be One carried speed over rough terrain. Racers will immediately notice that getting off the brakes sooner won't get you into trouble. The stiffness and stability of the rear end inspired confidence without adversely affecting pedaling. The E13 guide may be new, but it's definitely equal to, if not better than, any chainguide you can buy. If you find yourself frequently casing rocks and logs, take a good hard look at the SRS. The slack seatmast lets riders tune the size of the bike, despite being a one-size fits all frame. Being able to change the rising rate and travel without changing the angles of the bike is a feature that racers will love.

The Be One is a pure race bike that has a very non-American feel and look to it. The Be One's pricing is a little higher than some downhill frames, but certainly not out of the range of bikes like the Turner, Intense and Foes. The Be One can more than hold its own against any downhill design on the course. □



All rounder: Getting the Be One sideways was no problem with the ample standover clearance. Its athletic numbers complemented the big hit absorbing ability of the rear suspension.



Suck it up: If you're looking for a bike that seems to be ridden fast, take a good look at the Be One. Randy Spangler had to make a few adjustments to the rear before the really big drop in the foreground.

SPECIFICATIONS AND GEOMETRY

GENERAL

The Be One is a pure race bike that has a very non-American feel and look to it. The Be One's pricing is a little higher than some downhill frames, but certainly not out of the range of bikes like the Turner, Intense and Foes. The Be One can more than hold its own against any downhill design on the course.

WHEELS

The Be One is a pure race bike that has a very non-American feel and look to it. The Be One's pricing is a little higher than some downhill frames, but certainly not out of the range of bikes like the Turner, Intense and Foes. The Be One can more than hold its own against any downhill design on the course.

BRAKES

The Be One is a pure race bike that has a very non-American feel and look to it. The Be One's pricing is a little higher than some downhill frames, but certainly not out of the range of bikes like the Turner, Intense and Foes. The Be One can more than hold its own against any downhill design on the course.

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CONTACT

The Be One is a pure race bike that has a very non-American feel and look to it. The Be One's pricing is a little higher than some downhill frames, but certainly not out of the range of bikes like the Turner, Intense and Foes. The Be One can more than hold its own against any downhill design on the course.

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT F

litter

the mega-zine

Volume 10 Number 1



THE GLEE OTTER 2003
PRETTY IN PLATTEKILL
TOUR OF MANYONLANDS
CURTIS KEENE FINDS HIMSELF

SONIC
BOMBARDIER

ultra famous
sport class race
leader grand

glee otter 2003
pretty in plattekill
tour of manyonlands
curtis keene finds himself

TOOLBOX

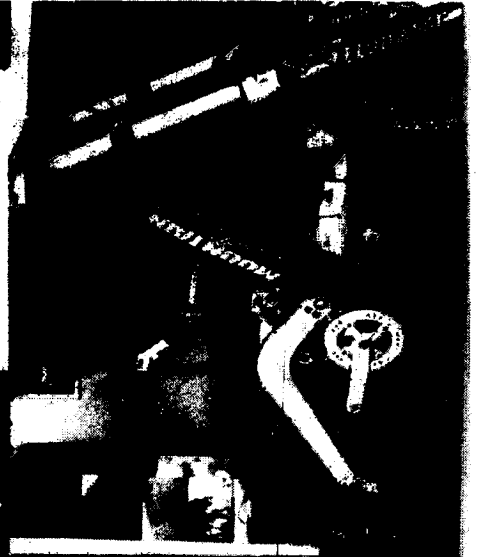
spy photos & spy words
CHRIS "big red" HANNA

Take Rotec's downhill bike, beef up the head tube, add a front derailleur, and you have the Moto FR. Rotec's play bike. The Moto FR features 6" of plush travel via 5th element, Romic or Avalon shock. A 1.5 head tube is available, as well as, the ability to run a 26" of 24" rear wheel. The Moto FR is also the first production frame to offer the "Integrated Damper Mounting System" for the Hoppy Steering Damper. The Moto FR features a built in fork stopper on the down tube. Not only do you get an outstanding frame, you get great customer service from John "Sully" Sullivan, the guy behind Rotec Cycles. Sully is one the nicest guys out there. check out www.roteccycles.com

rotec moto fr



The Shockwave 9.5 is the all new flagship for Dethatching and Pileable, designed to exceed the requirements of the fastest, most technical and fearless riders in the world. The Shockwave boasts a whopping 9.5" of travel and features detachable dropouts for that - ended on quick release wheels. The 9.5 has CNC'd parts and swingarm linkage components for added stiffness and long lasting strength. The frame is handbuilt in the USA and features ceramic bearings throughout. Visit their website www.mountainbicycle.com and build your own custom spec Shockwave 9.5.



Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT G

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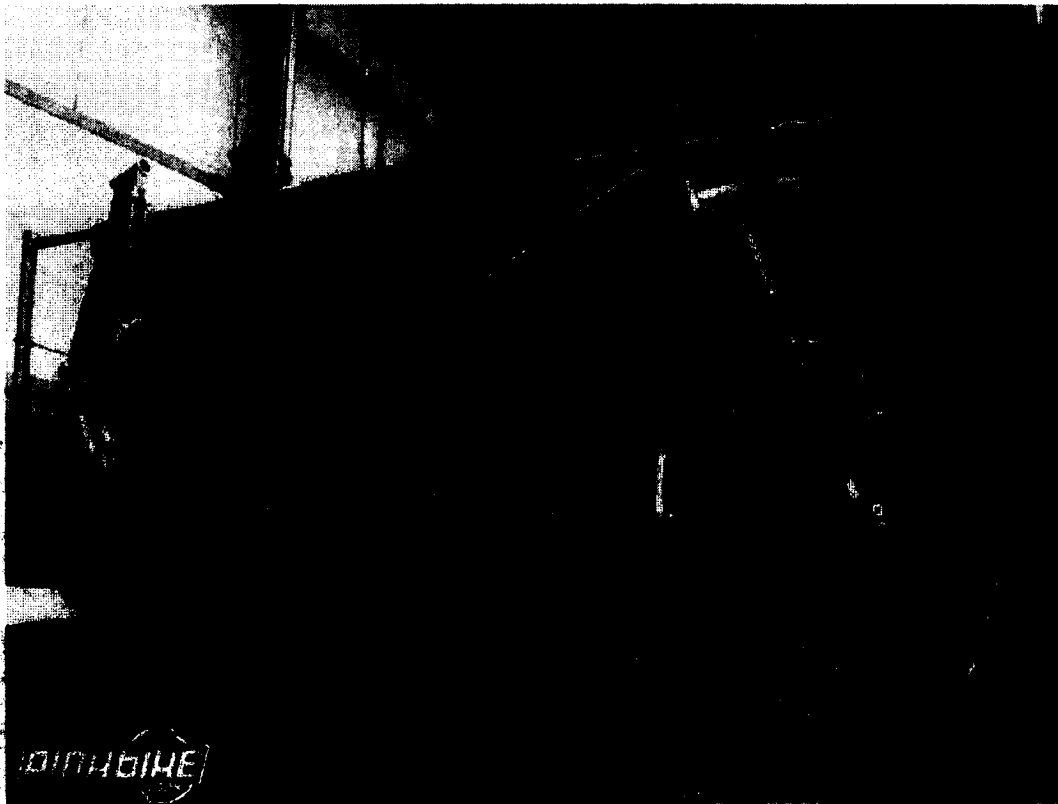
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STYLING: KIMBERLY L. DILL

Evil Bikes/E.thirteen Components at Interbike

by Luc 'Acadian' Albert
Oct 30, 2009

A lot of new stuff from the Evil/e.thirteen guys. First big news was the announcement of their new Sovereign hardtail. The Sovereign frame was designed primarily as a street/trail frame. Its development began just before the Interbike 2001 tradeshow, and it took almost 1.5 years for them to get its custom butted/ sized Reynolds 853 tube set completed. They wanted something that a rider could take on a day long seated XC ride, yet still handle the largest drops and most technical ramp action. Handling had to be on par with the Imperial frame, so Evil laid out the bike's geometry to be quick but balanced, a combination that Evil feels they have perfected, but eludes many others. The frame had to be easily convertible to single speed, yet still offer the security and convenience of a vertical dropout.



The Sovereign uses a geometry set that they first tested with their Alpha prototype Imperial frames in 2001. Because they wanted this frame to do double duty as a high strength trail and park bike (with less of an emphasis on Mountain X, DH), the head angle reverts back to 69 degrees with a 5-inch fork, and it features the Imperial's 13 inch bb height. With this layout, X-ups and bar spins are simple, and front toe friendly. Top tube length is a little longer than the Imperial at 23.1. Wheelbase remains pegged around 41 inches. Like the Imperial, the seat post is actually very slightly off-center of the BB to attain desired flex characteristics in the rear end of the bike.

The Sovereign displays several innovative geometry features that deserve special mention.

First, is its 16.5 inch long seat tube. Evil's FEA testing consistently showed them that a 13.5 inch frame is not capable of supporting a full length raised seat post enough to prevent breakage and possible rider injury. After much computer-aided analysis, Dave Weagle found that increasing seat tube length and seat post diameter could allow riders to run their seat height at



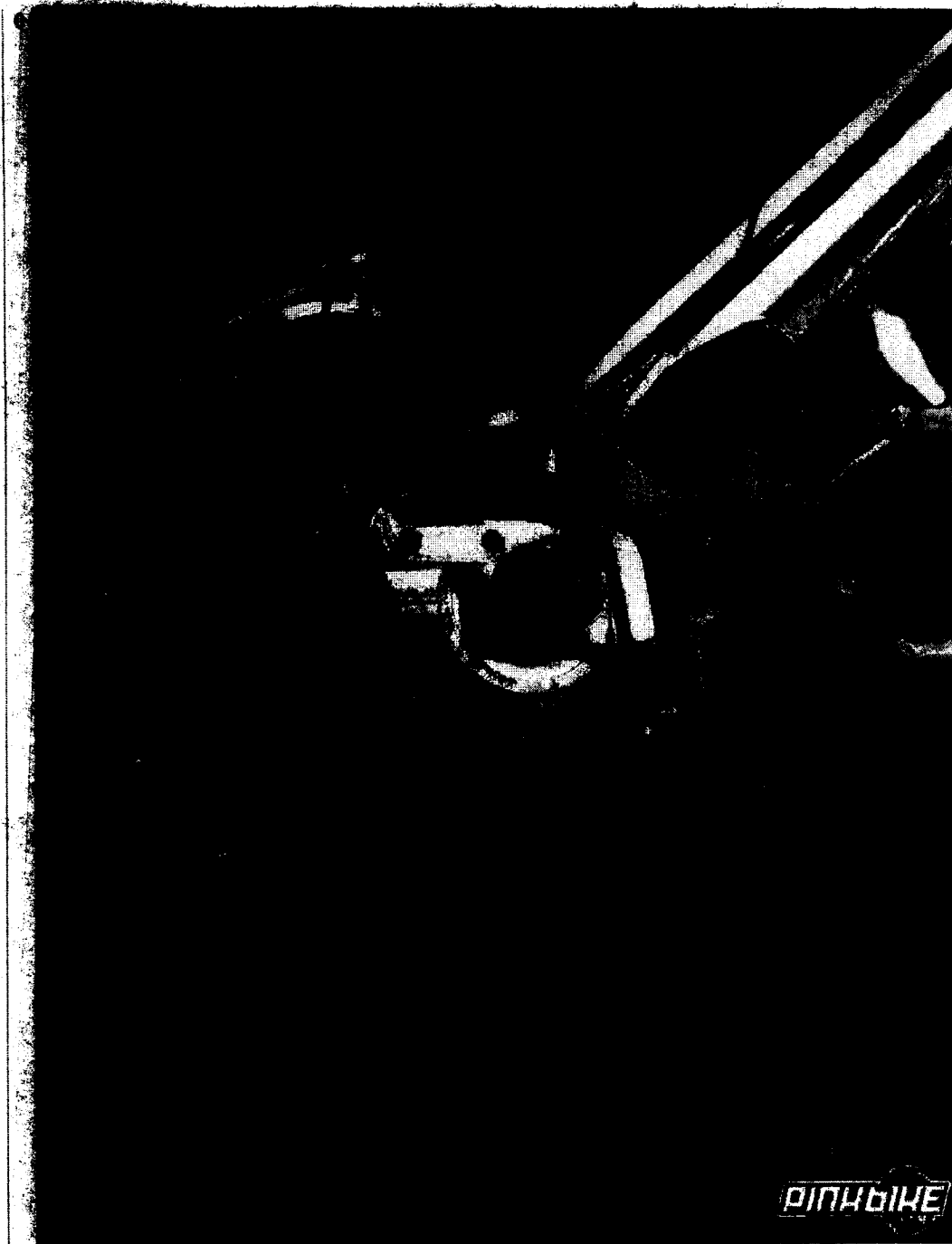
[Learn more](#)

full length.

Second is its super short chainstay length capability. The Sovereign frame can run a 26X2.35 tire at a minimum chainstay length of 14.5 inches. With this combination, there is plenty of mud clearance as well. For comparison, most other steel frames on the market struggle to attain a 15.75 minimum chainstay with a 24 inch wheel. This unique and highly desirable feature is a function of their exclusive offset asymmetrical monostay construction.

The third geometry feature that makes this bike special is its ability to run 26 inch or 24 inch rear wheels without changing frame geometry. The rear chainstays and dropouts were designed to allow a 24 inch specific rear dropout that drops the rear axle center by ~1 inch to compensate for the 24 inch rear wheel.

The double-X rated dropout system is a combination of the Imperial's triple-X-rated system, and a sliding dropout. The reason for this unique setup may not be immediately apparent to most, but makes a lot of sense when it is explained. With that being said, here's the explanation! Because this is a multi-duty frame, it needs to be versatile. Street riders prefer short chainstay lengths, and sometimes even a single-speed setup. Almost all trail riders prefer longer chainstay lengths and derailleurs. In order to accommodate this, some sort of chainstay length adjustment is necessary. The sovereign frame features 32mm of horizontal chainstay adjustment (15.5 in to 16.76 in). This adjustment is broken down into two 16mm pieces. The reality is that by using a shorter adjustment slot, Dave built a lighter and stronger rear dropout system than any other they had tested previously. They have devised and tested other ways of accomplishing this goal, just none as reliable, strong, versatile, and lightweight as what is presented on this frame.



Material: One of the things that make this frame incredibly special is its Reynolds 853/725 air-hardening tube set. For those who are not familiar with Reynolds, you can view information about them at www.reynoldsusa.com. Reynolds steel tubing is considered by many to be the highest quality in the world. All of the tubing is pierced and butted from solid billet instead of rolled and welded from sheet stock like some other tubing. Over the last 1.5 years, they have worked closely with the engineers at Reynolds to develop a high strength butted tube set that could be used for this application. This was a groundbreaking project for Evil and Reynolds at the same time. Over the last 100 years, their tube sets have been refined over and over. Their frames have won numerous road titles around the world. Never before though, had they built a tube set as strong as what Evil needed for the Sovereign frame. Through Evil's high level of analysis, they were able to develop a specification for this tube set. Reynolds manufactured them to exacting precision, and the result is the incredibly strong, yet 5.2 lb light Sovereign frameset. This custom tube set allowed them to build a frame with an incredible strength to weight ratio compared to normal 4130 and other types of formed steel tubing. The strength to weight ratio should be close to the Imperial frame, which right now is at the same level as some top road and XC hardtail frames. As far as Dave's analysis has shown, at this point, there seem to be no other frames in the aggressive market with this level of structural refinement applied to them. (not to say that means the bikes can't be broken, just that these bikes are "special" in that they possess unusually high strength to weight ratios) Over the next 4 months, they plan to ride as hard as they can to test these prototype frames. With any luck they will learn some things and apply what they learn to the production models. Dave has a few ideas already. A summer release is planned.




Also on display was their prototype Imperial G-Boxx hardtail called "2013i". The bike is still in it's very early stage and is not to be manufactured for at least a few years, thus the name 2013i. If Evil were to produce this bike for summer of 2004, it would end up being ridiculously expensive. So keep an eye on their site for more updates.



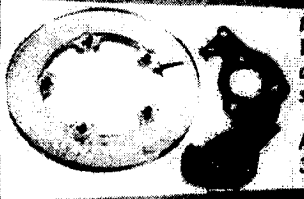


On the component side of things, e.thirteen has a few new goodies in store for 2004. New chainrings, Stems, pedals, bashguards and guides!




the guide to have if you want to win! Our incredibly strong SUPERDUALIZER™ bashings, stainless steel hardware, and super stiff boomarming make us the new standard of performance, light weight, and durability. Winner of Consumer Review Choice award.

Available in 5-110, 4-104 and 5-94 Bolt Hole Patterns.
Mountain-X (32-40T), East Coast (32-42T) and 44 Special (32-44T)




they need, and the ability to run two front derailleurs with a derailleur. Winner of arden and pink magazine dragguide shootouts as well as consumer awards. Now for 2004 is an improved, soft downstroke roller, that makes our superb DRS™ guide system even quieter.

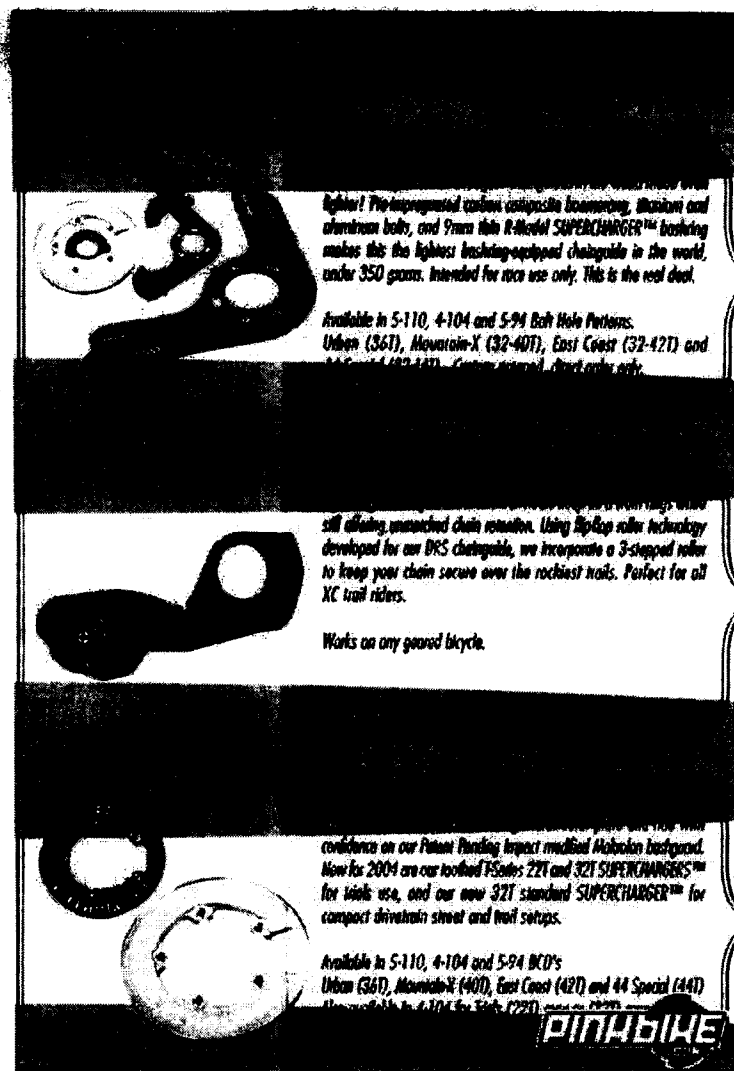
Available in 5-110, 4-104 and 5-94. E-type derailleur boomarming available.
36T or 40T bashing.



for street and high wheel trail use. This is the guide that has been ripping up parks and street competitions all over the world!

Available in 5-110, 4-104 and 5-94 Bolt Hole Patterns.
(32-36T)





Lightest Pre-impregnated carbon, anodized aluminum, titanium and aluminum body, and 7mm thin R-Metal **SUPERCHARGER™** bushing makes this the lightest bushing-equipped chainguide in the world, under 350 grams. Intended for race use only. This is the real deal.

Available in 5-110, 4-104 and 5-94 Bolt Hole Patterns.
Urban (36T), Mountain-X (32-40T), East Coast (32-42T) and 44 Special (44T). Custom ordered. Direct order only.


still allowing unmatched chain retention. Using **Flip-Flop** roller technology developed for our **DKS** chainguide, we incorporate a 3-stepped roller to keep your chain secure over the roughest trails. Perfect for all XC trail riders.

Works on any geared bicycle.

confidence on our Patent Pending Impact modified Mahlon background. Now for 2004 are our toothed **T-Sides 22T and 32T SUPERCHARGERS™** for trials use, and our new **32T standard SUPERCHARGER™** for compact drivetrain street and trail setups.


Available in 5-110, 4-104 and 5-94 BCD's
Urban (36T), Mountain-X (40T), East Coast (42T) and 44 Special (44T)
Also available in 4-104 for 36T (22T) and 44 (22T)

PINKBIKE




These rings are very stiff, longwearing, and lightweight. The last chainring engineered specifically to improve chainguide performance and ease of setup. Perfect for chainguide and singlespeed use.

Available in 4-104, 36T, 38T, or 40T.



These chainrings allow perfect chainguide setup by mounting your bashing directly onto the Crown Chainwheel, and eliminating your spider. Machined out of 7075 T6, for incredible resistance to impact and wear.

Available in 5-110 36T and 40T.



[Click here to play Dave Weagle's 2004 Interbike Audio Interview.](#)

For more info on Evil bikes visit their web site at www.evilibikes.com

For more info about e.thirteen components visit their web site at www.e13components.com

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Link to News Story

<http://www.pinkbike.com/news/article1722.html>

Must Read This Week

1. STUND Episode 5 - Watch Now! 25473 reads
2. Andrew Taylor - Bike Check 18320 reads
3. Chase Life #9 - Get yo 3's dumped! 15310 reads
4. X Fusion Side flight Championships 14500 reads
5. Ibis Bikes 14447 reads
6. Sam Blenkinsop joins Lapiere! 14351 reads
7. Loeka Tech Jacket & Pants Review 13236 reads
8. Picture Of The Month - November 12702 reads

Post A New Comment

Why was a comment deleted?

1. add additional on topic info to the article that other users will find useful
2. add props and support/encouragement for the video/photo/article/product/story
3. add and explain constructive criticism for the video/photo/article/product/story

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Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT H

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

Registration No.: 3147241
For the mark: east13
Date registered: September 26, 2006

Registration No.: 3158549
For the mark: East Thirteen
Date registered: October 17, 2006

LIVE VENTURES INC.

PETITIONER,

v.

SAROJ INTERNATIONAL, INC.

REGISTRANT.

CANCELLATION No. 92047661

**PETITIONER'S FIRST SET OF INTERROGATORIES
TO REGISTRANT SAROJ INTERNATIONAL**

Pursuant to Federal Rule of Civil Procedure 33 and 37 C.F.R. § 2.120(d)(1), petitioner Live Ventures Inc. ("Petitioner") hereby requests that registrant Saroj International, Inc. ("Registrant") through one or more authorized officers or agents of Registrant, and in compliance with the definitions and instructions herein, answer separately and under oath the interrogatories set forth below within thirty (30) days after the service of the interrogatories.

DEFINITIONS

1. "REGISTRANT," "YOU" or "YOUR" means Saroj International, Inc., registrant and owner of U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549, and any person or entity that has used or uses any one or more of the trademarks under U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549 with authorization from Saroj International, Inc.

2. "PETITIONER" means Live Ventures Inc., petitioner in the captioned cancellation proceeding.

3. "997 MARK" means the trademark WWW.EAST13.COM under U.S. Trademark Registration No. 3143997.

4. "997 REGISTRATION" means U.S. Trademark Registration No. 3143997.

5. "241 MARK" means the trademark EAST13 under U.S. Trademark Registration No. 3147241.

6. "241 REGISTRATION" means U.S. Trademark Registration No. 3147241.

7. "549 MARK" means the trademark EAST THIRTEEN under U.S. Trademark Registration No. 3158549.

8. "549 REGISTRATION" means U.S. Trademark Registration No. 3158549.

9. "PETITION" means the Petition to Cancel filed by Petitioner in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

10. "ANSWER" means the Answer filed by REGISTRANT in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

11. "USE," when employed with reference to a trademark, means the use of the trademark in accordance with 15 U.S.C. § 1051(a).

12. "COMMERCE," when employed with reference to a trademark or products under a trademark, means commerce in accordance with 15 U.S.C. § 1127.

13. "USE IN COMMERCE," when employed with reference to a trademark or products under a trademark, means use in commerce in accordance with 15 U.S.C. § 1127.

14. "NATURE" of use of a trademark means how the trademark was used, e.g., was the trademark used on a product, in a brochure, in a website, in a letter, or in any other way.

15. "DATE" of use of a trademark means the day, month and year of the use, or as much of that information as possible.

16. "VOLUME OF SALES" means the dollar amount of sales, *i.e.*, how much was billed for the sales and how much was paid for the sales; also the number of goods sold, e.g., the number of each of the goods listed on the trademark registration inquired about.

17. "ALL RELEVANT FACTS AND CIRCUMSTANCES," when employed with reference to the USE of a trademark, means all information that is relevant to evaluating the USE of the trademark.

18. "And" and "or" shall be construed conjunctively or disjunctively, whichever makes the requests more inclusive. The term "all" shall mean "any and all," and the term "any" shall mean "any and all." The singular of any word or phrase shall include the plural of such word or phrase, and the plural of any word or phrase shall include the singular of such word or phrase.

19. The terms "DOCUMENTS," "WRITINGS" or "RECORDINGS" as used herein are used in their broadest sense and include, without limitation, any type of written, recorded, electronic, graphic or photographic matter of any kind or character, however produced or reproduced, including but not limited to all photographs, sketches, drawings, videotapes, audiotapes, letters, telegrams, telexes, facsimiles, electronic mail, correspondence, brochures, manuals, press releases, transcripts of interviews, transcripts of speeches, product guides, contracts, consulting agreements, other agreements, business plans, deeds, drafts, workpapers, plans, blueprints, specifications, comparisons, surveys, data sheets, analyses, calculations, files (and their contents), notes to the files, reports, publications, mechanical and electronic sound recordings or transcripts thereof, calendar or diary entries, memoranda of telephone or personal conversations or of meetings or conferences, maps, studies, reports, charts, inter-office communications, minutes of meetings, articles, announcements, ledgers, vouchers, checks, receipts and invoices.

20. The term "COMMUNICATION" shall mean any oral or written transmittal, correspondence, and/or receipt of words or information, whether such was by chance, pre-arranged, formal or informal, including but not limited to conversations in person, telephone conversations, telegrams, telexes, facsimiles, letters, emails, reports or

memoranda, formal statements, newspaper stories, notes of telephone conversations, notes of meetings, data compilations, and electronically stored data.

21. The terms "PERSON" or "PEOPLE" include any natural person, firm, association, organization, partnership, business, trust, corporation, or public entity.

22. The terms "RELATE" or "REFER" mean directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon any one or more subject matters described in the discovery request.

23. The terms "IDENTIFY" or "IDENTITY" when used in connection with an individual means: state the individual's full name; his or her home and business address; his or her present employer; his or her position, title, or job description; and, if employed by you, the individual's dates and regular places of employment, and general duties.

24. The terms "IDENTIFY" or "IDENTITY" when used in connection with a company, corporation, association, partnership, joint venture, or any legal entity other than a natural person means: state its full name and type of organization or entity; the address of its principal place of business; its date and place of incorporation; and identify its officers, directors, and managing agents.

25. The use of any verb in any tense shall be construed as the use of that verb in all tenses to the extent that so doing will include information which would otherwise be excluded.

26. In these requests, (i) the use of a word in its singular form shall be deemed to include its use in the plural form as well, and *vice versa*, and (ii) "any" includes "all," and *vice versa*.

27. The use of any verb in any tense shall be construed as the use of that verb in all tenses to the extent that so doing will include information which would otherwise be excluded.

INSTRUCTIONS

A. Where knowledge or information in YOUR possession is requested, the request extends to knowledge or information in the possession of YOUR predecessors and/or successors, as well as to information in the possession of YOUR officers, directors, agents, employees, servants, representatives and, unless privileged, attorneys. Whenever an answer to these interrogatories contains information that is not based upon YOUR personal knowledge, state the source and the nature of such information.

B. In the event REGISTRANT claims that an interrogatory is overly broad, REGISTRANT shall respond to that portion of the interrogatory which it deems unobjectionable and specifically identify the respect in which the interrogatory is allegedly overly broad.

C. In the event REGISTRANT claims that an interrogatory is unduly burdensome, REGISTRANT shall respond to that portion of the interrogatory which is unobjectionable and specifically identify the respect in which the interrogatory is allegedly unduly burdensome.

D. With respect to any information that REGISTRANT is unwilling to provide because the information is asserted to be immune from discovery under the attorney

client privilege or work product immunity, state separately with respect to such information:

(1) the general nature of the information (i.e., whether it is a letter, memorandum, report, pamphlet, etc.);

(2) the date on which such information was created, reproduced or transcribed;

(3) the name of the person who created, located, or identified such information and the name of each such person who has edited, corrected, revised, or amended the same;

(4) the name of each person to whom such information was given, shown, or sent, or otherwise known to REGISTRANT as being intended or actual recipient of a copy thereof,

(5) the name of the person having possession, custody, or control of any document or tangible thing comprising, recording or containing such information (or any copy thereof);

(6) a brief indication of the subject matter of such information;

(7) the grounds for the claimed privilege or immunity as to each such information;

(8) for each person identified in items c-e, an indication of whether such person is an attorney and was acting as an attorney in connection with his being associated with such information; and

(9) the interrogatory to which the information is responsive.

To the extent that an interrogatory concerns both privileged and unprivileged material, the unprivileged material shall be disclosed to the fullest extent possible without disclosing the privileged material.

E. If YOU cannot answer any interrogatory fully and completely after exercising due diligence to make inquiry and secure the information necessary to do so, please so state and answer each such interrogatory to the fullest extent YOU deem possible, specify the portion of each interrogatory that YOU claim to be unable to answer fully and completely, state the facts upon which YOU rely to support YOUR contention that YOU are unable to answer the interrogatory fully and completely, and state what knowledge, information and belief YOU have concerning the unanswered portion of such interrogatory.

F. These interrogatories shall be deemed continuing, and any additional information included in any way in these interrogatories that REGISTRANT identifies, acquires, or creates subsequent to the date of responding to these interrogatories, and up to and including the time of trial, shall be furnished to PETITIONER in accordance with Fed. R. Civ. P. 26(e) as supplemental responses to these interrogatories promptly after such information is identified, acquired or created.

G. The capitalization of words is used only as an aid and is not required for application of the definitions set out above.

INTERROGATORIES

INTERROGATORY NO. 1:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for backpacks prior to March 5, 2005.

INTERROGATORY NO. 2:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for wallets prior to March 5, 2005.

INTERROGATORY NO. 3:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for t-shirts prior to March 5, 2005.

INTERROGATORY NO. 4:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for swimwear prior to March 5, 2005.

INTERROGATORY NO. 5:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for socks prior to March 5, 2005.

INTERROGATORY NO. 6:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for shoes prior to March 5, 2005.

INTERROGATORY NO. 7:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for hats prior to March 5, 2005.

INTERROGATORY NO. 8:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for scarves prior to March 5, 2005.

INTERROGATORY NO. 9:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for coats prior to March 5, 2005.

INTERROGATORY NO. 10:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for jackets prior to March 5, 2005.

INTERROGATORY NO. 11:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for rainwear prior to March 5, 2005.

INTERROGATORY NO. 12:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for gloves prior to March 5, 2005.

INTERROGATORY NO. 13:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for denim jeans prior to March 5, 2005.

INTERROGATORY NO. 14:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for backpacks prior to March 5, 2005.

INTERROGATORY NO. 15:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for wallets prior to March 5, 2005.

INTERROGATORY NO. 16:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for t-shirts prior to March 5, 2005.

INTERROGATORY NO. 17:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for swimwear prior to March 5, 2005.

INTERROGATORY NO. 18:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for socks prior to March 5, 2005.

INTERROGATORY NO. 19:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for shoes prior to March 5, 2005.

INTERROGATORY NO. 20:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for hats prior to March 5, 2005.

INTERROGATORY NO. 21:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for scarves prior to March 5, 2005.

INTERROGATORY NO. 22:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for coats prior to March 5, 2005.

INTERROGATORY NO. 23:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for jackets prior to March 5, 2005.

INTERROGATORY NO. 24:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for rainwear prior to March 5, 2005.

INTERROGATORY NO. 25:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for gloves prior to March 5, 2005.

INTERROGATORY NO. 26:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for denim jeans prior to March 5, 2005.

INTERROGATORY NO. 27:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK for retail clothing boutiques prior to November 30, 2005.

INTERROGATORY NO. 28:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR first USE of the 997 MARK.

INTERROGATORY NO. 29:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR first USE of the 241 MARK.

INTERROGATORY NO. 30:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR first USE of the 549 MARK.

INTERROGATORY NO. 31:

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 997 MARK.

INTERROGATORY NO. 32:

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 241 MARK.

INTERROGATORY NO. 33:

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, under the 549 MARK.

INTERROGATORY NO. 34:

IDENTIFY all PERSONS that have ever USED the 997 MARK.

INTERROGATORY NO. 35:

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 34, describe the USE of the 997 MARK by such PERSON.

INTERROGATORY NO. 36:

IDENTIFY all PERSONS that have ever USED the 241 MARK.

INTERROGATORY NO. 37:

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 36, describe the USE of the 241 MARK by such PERSON.

INTERROGATORY NO. 38:

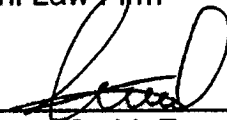
IDENTIFY all PERSONS that have ever USED the 549 MARK.

INTERROGATORY NO. 39:

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 38, describe the USE of the 549 MARK by such PERSON.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S FIRST SET OF INTERROGATORIES TO REGISTRANT SAROJ INTERNATIONAL has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on August 2, 2007, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 707 Broadway Street, Suite 1800, San Diego, California 92101.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT I

TRADEMARK

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

LIVE VENTURES, INC.

Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.

Registrant.

CANCELLATION NO: 92047661

Registration No: 3143997

Registration No: 3147241

Registration No: 3158549

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
FIRST SUPPLEMENTAL
RESPONSE TO PETITIONER'S FIRST SET OF INTERROGATORIES**

I. General Objections

The following general objections are continuing in nature and shall apply to each Request and shall be incorporated into each response. Each individual Response is made subject to, and without waiver of, such general objection.

1. Saroj International, Inc.'s Responses herein are based upon the facts it knows at this time. Saroj International, Inc. may become aware of additional data, documentation and/or other and more specific facts which may be material to its Responses herein. Accordingly, Saroj International, Inc. reserves its rights to supplement or modify these Responses, in its sole discretion.
2. Saroj International, Inc. objects generally to the First Set as overly broad, unduly and oppressive insofar as Petitioner seeks to discover information about matters not relevant to the subject matter of this action, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, Saroj International, Inc. will respond to the extent the First Set is relevant to the subject matter of this action, or is reasonably calculated to lead to the discovery of admissible evidence.
3. Saroj International, Inc. objects generally to the First Set insofar as it may be construed as calling for the disclosure of material or information which is privileged and/or reflect attorney work product. To the extent Responses would include privileged or protected information, Saroj International, Inc. will not respond.
4. Saroj International, Inc. objects generally to the First Set as overly broad,

unduly burdensome, oppressive, vague, ambiguous and uncertain insofar as the instructions and definitions used in the First Set purport to impose obligations on Saroj International, Inc. beyond the scope of Rule 33. Without waiver of its objections, Saroj International, Inc. will respond consistent with the requirements of Rule 33.

5. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is not clearly identified or is not identified with sufficient particularity. Without waiver of its objections, Saroj International, Inc. has made reasonable interpretations of Petitioner's intended meanings, and will respond accordingly to such interpretations as set forth below.

6. Saroj International, Inc. objects generally to the First Set to the extent that does not specify a time period for any of the information sought.

7. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is keenly proprietary and represents trade secret information under State and Federal Law including the Uniform Trades Secrets Act, the disclosure of which will not be made unless a suitable Protective Order is in place.

II. Responses to Interrogatories

Interrogatory No. 1

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR

USE of the 997 MARK for backpacks prior to March 5, 2005.

Response to Interrogatory No. 1

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 2

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 997 MARK for wallets prior to March 5, 2005.

Response to Interrogatory No. 2

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 3

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 997 MARK for t-shirts prior to March 5, 2005.

Response to Interrogatory No. 3

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 4

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for swimwear prior to March 5, 2005.

Response to Interrogatory No. 4

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 5

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for socks prior to March 5, 2005.

Response to Interrogatory No. 5

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances

identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 6

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for shoes prior to March 5, 2005.

Response to Interrogatory No. 6

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 7

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for hats prior to March 5, 2005.

Response to Interrogatory No. 7

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to

provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 8

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for scarves prior to March 5, 2005.

Response to Interrogatory No. 8

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 9

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for coats prior to March 5, 2005.

Response to Interrogatory No. 9

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 10

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 997 MARK for jackets prior to March 5, 2005.

Response to Interrogatory No. 10

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 11

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 997 MARK for rainwear prior to March 5, 2005.

Response to Interrogatory No. 11

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 12

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR

USE of the 997 MARK for gloves prior to March 5, 2005.

Response to Interrogatory No. 12

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 13

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 997 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 13

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. worked with designer in LA to create accessories and tags for denim line; worked with manufacturers in Hong Kong in early 2003 to make denim samples; and worked with an independent sales rep, Walter Osband, to attempt to sell jeans to retail/wholesale customers. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 14

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for backpacks prior to March 5, 2005.

Response to Interrogatory No. 14

Saroj International, Inc. has made a diligent search and reasonable inquiry
has been made in an effort to ascertain all relevant facts and circumstances
identified in this interrogatory, but have been unable to ascertain any information
responsive to the interrogatory. Saroj International, Inc. will honor its duty to
provide supplement discovery Responses under FRCP 26(e)(1), and shall
provide such supplemental Responses when appropriate.

Interrogatory No. 15

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for wallets prior to March 5, 2005.

Response to Interrogatory No. 15

Saroj International, Inc. has made a diligent search and reasonable inquiry
has been made in an effort to ascertain all relevant facts and circumstances
identified in this interrogatory, but have been unable to ascertain any information
responsive to the interrogatory. Saroj International, Inc. will honor its duty to
provide supplement discovery Responses under FRCP 26(e)(1), and shall
provide such supplemental Responses when appropriate.

Interrogatory No. 16

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for t-shirts prior to March 5, 2005.

Response to Interrogatory No. 16

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 17

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for swimwear prior to March 5, 2005.

Response to Interrogatory No. 17

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 18

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for socks prior to March 5, 2005.

Response to Interrogatory No. 18

Saroj International, Inc. has made a diligent search and reasonable inquiry

has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 19

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for shoes prior to March 5, 2005.

Response to Interrogatory No. 19

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 20

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for hats prior to March 5, 2005.

Response to Interrogatory No. 20

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information

responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 21

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for scarves prior to March 5, 2005.

Response to Interrogatory No. 21

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 22

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for coats prior to March 5, 2005.

Response to Interrogatory No. 22

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall

provide such supplemental Responses when appropriate.

Interrogatory No. 23

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for jackets prior to March 5, 2005.

Response to Interrogatory No. 23

Saroj International, Inc. has made a diligent search and reasonable inquiry
has been made in an effort to ascertain all relevant facts and circumstances
identified in this interrogatory, but have been unable to ascertain any information
responsive to the interrogatory. Saroj International, Inc. will honor its duty to
provide supplement discovery Responses under FRCP 26(e)(1), and shall
provide such supplemental Responses when appropriate.

Interrogatory No. 24

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for rainwear prior to March 5, 2005.

Response to Interrogatory No. 24

Saroj International, Inc. has made a diligent search and reasonable inquiry
has been made in an effort to ascertain all relevant facts and circumstances
identified in this interrogatory, but have been unable to ascertain any information
responsive to the interrogatory. Saroj International, Inc. will honor its duty to
provide supplement discovery Responses under FRCP 26(e)(1), and shall
provide such supplemental Responses when appropriate.

Interrogatory No. 25

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for gloves prior to March 5, 2005.

Response to Interrogatory No. 25

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 26

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 26

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. worked with designer in LA to create accessories and tags for denim line; worked with manufacturers in Hong Kong in early 2003 to make denim samples; and worked with an independent sales rep, Walter Osband, to attempt to sell jeans to retail/wholesale customers. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 27

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 549 MARK for retail clothing boutiques prior to November 30, 2005.

Response to Interrogatory No. 27

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. negotiated a lease agreement for store in July 2005; secured a City of Pasadena business license issued August 2005; completed construction for retail store early November 2005; secured orders for merchandise Summer 2005; advertised the store in local print, radio and internet media; advertised for and hired a workforce for the store; and sold merchandise through the store. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 28

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 997 MARK.

Response to Interrogatory No. 28

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Internet

domain name was secured and website was established for www.east13.com; advertisement for merchandise was presented on the website clearly bearing the 997 mark; agreements were negotiated in order to market and position www.east13.com within internet search engines; merchandise was advertised and sold using the www.eastt13.com website. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 29

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK.

Response to Interrogatory No. 29

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: graphic artist was identified and contracted to develop EAST13 logo for use on clothing line; clothing was designed and samples were ordered and secured for clothing line bearing the EAST13 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 30

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK.

Response to Interrogatory No. 30

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. negotiated a lease agreement for store in July 2005; secured a City of Pasadena business license issued August 2005; completed construction for retail store early November 2005; secured orders for merchandise Summer 2005; advertised the store in local print, radio and internet media; advertised for and hired a workforce for the store; and sold merchandise through the store. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 31

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 997 MARK.

Response to Interrogatory No. 31

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 32

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 241 MARK.

Response to Interrogatory No. 32

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 33

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 549 MARK.

Response to Interrogatory No. 33

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds:

A. Q4 2005	\$10,633.93
B. Q1 2006	\$55,377.31
C. Q2 2006	\$42,838.38
D. Q3 2006	\$81,316.85
E. Q4 2006	\$69,252.03

F. Q1 2007	\$79,684.42
G. Q2 2007	\$101,167.07
H. Q3 2007	\$26,987.23

Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 34

IDENTIFY all PERSONS that have ever USED the 997 MARK.

Response to Interrogatory No. 34

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is, and has always been, the sole user of the 997 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 35

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 34, describe the USE of the 997 MARK by such PERSON.

Response to Interrogatory No. 35

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is the sole user of the 997 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 36

IDENTIFY all PERSONS that have ever USED the 241 MARK.

Response to Interrogatory No. 36

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is, and has always been, the sole user of the 241 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 37

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 36, describe the USE of the 241 MARK by such PERSON.

Response to Interrogatory No. 37

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is the sole user of the 241 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 38

IDENTIFY all PERSONS that have ever USED the 549 MARK.

Response to Interrogatory No. 38

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is, and has always been, the sole user of the 549 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 39


If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 38, describe the USE of the 549 MARK by such PERSON.

Response to Interrogatory No. 39

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is the sole user of the 549 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Dated: September 20, 2007

By: _____


Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

Certification

I, Jaivin Karnani, am authorized on behalf of Saroj International, Inc., to provide responses to the above Interrogatories. The above responses are made following reasonable inquiry and investigation. I swear under the penalty of perjury that the above is true and correct.

Registrant Saroj International's First Supplemental Response to
Petitioner's First Set of Interrogatories

Dated: September 10, 2007

Jaivin K.

Jaivin Karnani

CERTIFICATE OF SERVICE

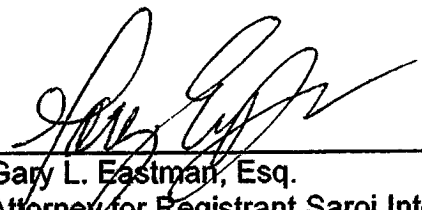
I hereby certify that a true and complete copy of the foregoing FIRST SUPPLEMENTAL Response to First Set of Interrogatories has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on September 20 2007 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWSWEET LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: September 20, 2007

By: _____


Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT J

TRADEMARK

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

LIVE VENTURES, INC.

Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.

Registrant.

CANCELLATION NO: 92047661

Registration No: 3143997

Registration No: 3147241

Registration No: 3158549

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
SECOND SUPPLEMENTAL
RESPONSE TO PETITIONER'S FIRST SET OF INTERROGATORIES**

I. Responses to Interrogatories

Interrogatory No. 13

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 13

No facts or circumstances exist which would show use of the 997 MARK for denim jeans prior to March 5, 2005.

Interrogatory No. 26

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 26

No facts or circumstances exist which would show use of the 241 MARK for denim jeans prior to March 5, 2005.

Interrogatory No. 27

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK for retail clothing boutiques prior to November 30, 2005.

Response to Interrogatory No. 27

The 549 MARK was used by Saroj International, Inc. in the selection and leasing of retail space, the design of window art and awnings showing the 549 MARK, and advertising the 549 MARK in conjunction with the

store's opening and operation, as supported by documents provided.

Interrogatory No. 28

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
FIRST USE of the 997 MARK.

Response to Interrogatory No. 28

Saroj International, Inc. began using the www.east13.com mark (997 MARK) by establishing ownership of the www.east13.com domain name on March 6, 2003, established a website and began utilizing the domain as a location for the company website and retail store. The mark www.east13.com was promoted online, in conjunction with the retail store, and was shown on labels affixed to clothing products sold and distributed.

Interrogatory No. 29

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
FIRST USE of the 241 MARK.

Response to Interrogatory No. 29

Saroj International, Inc. began using the EAST13 mark (241 MARK) in conjunction with the company's website, retail store and clothing on April 1, 2004. Since that time, the EAST13 mark was promoted in conjunction with the retail store, and was shown on labels affixed to clothing products sold and distributed.

Interrogatory No. 30

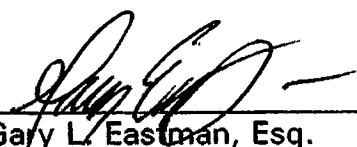
Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
FIRST USE of the 549 MARK.

Response to Interrogatory No. 30

Saroj International, Inc. began using the stylized EAST THIRTEEN mark (549 MARK) in conjunction with the company's website and retail store since it first began its retail store operations on October 1, 2005. Since that time, the EAST THIRTEEN mark was promoted in conjunction with the retail store, including the storefront signage, and was shown on labels affixed to clothing products sold and distributed.

Dated: March 18, 2008

By: _____


Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

VERIFICATION

I, Jaivin Karnani, am authorized to verify this response on behalf of Saroj International, Inc., the Registrant in the above cause of action. I have read the First Set of Interrogatories propounded to Saroj International, Inc. and the Second Supplemental Responses to the Interrogatories. I am familiar with the contents of both. I declare that the foregoing is true and correct.

Dated: March 17, 2008

By: Jaivin K
Jaivin Karnani

CERTIFICATE OF SERVICE


I hereby certify that a true and complete copy of the foregoing SECOND SUPPLEMENTAL Response to First Set of Interrogatories has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on March 18 2008 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWS LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: March 18, 2008

By: _____


Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT K

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

Registration No.: 3147241
For the mark: east13
Date registered: September 26, 2006

Registration No.: 3158549
For the mark: East Thirteen
Date registered: October 17, 2006

LIVE VENTURES INC.

PETITIONER,

v.

SAROJ INTERNATIONAL, INC.

REGISTRANT.

CANCELLATION No. 92047661

**PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS AND THINGS TO REGISTRANT SAROJ INTERNATIONAL**

Pursuant to Federal Rule of Civil Procedure 34 and 37 C.F.R. § 2.120(d)(2), petitioner Live Ventures Inc. ("Petitioner") hereby requests that registrant Saroj International, Inc. ("Registrant") produce the following documents and things for inspection and copying within thirty (30) days after the service of the requests for production of documents and things at the place where the documents and things are usually kept or at the offices of Stahl Law Firm, 2 Meadowsweet Ln, San Carlos, California 94070.

DEFINITIONS

1. "REGISTRANT," "YOU" or "YOUR" means Saroj International, Inc., registrant and owner of U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549.
2. "PETITIONER" means Live Ventures Inc., petitioner in the captioned cancellation proceeding.
3. "997 MARK" means the trademark WWW.EAST13.COM under U.S. Trademark Registration No. 3143997.
4. "997 REGISTRATION" means U.S. Trademark Registration No. 3143997.
5. "241 MARK" means the trademark EAST13 under U.S. Trademark Registration No. 3147241.
6. "241 REGISTRATION" means U.S. Trademark Registration No. 3147241.
7. "549 MARK" means the trademark EAST THIRTEEN under U.S. Trademark Registration No. 3158549.
8. "549 REGISTRATION" means U.S. Trademark Registration No. 3158549.

9. "PETITION" means the Petition to Cancel filed by Petitioner in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

10. "ANSWER" means the Answer filed by REGISTRANT in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

11. "USE," when employed with reference to a trademark, means the use of the trademark in accordance with 15 U.S.C. § 1051(a).

12. "COMMERCE," when employed with reference to a trademark or products under a trademark, means commerce in accordance with 15 U.S.C. § 1127.

13. "USE IN COMMERCE," when employed with reference to a trademark or products under a trademark, means use in commerce in accordance with 15 U.S.C. § 1127.

14. "NATURE" of use of a trademark means how the trademark was used, e.g., was the trademark used on a product, in a brochure, in a website, in a letter, or in any other way.

15. "DATE" of use of a trademark means the day, month and year of the use, or as much of that information as possible.

16. "VOLUME OF SALES" means the dollar amount of sales, *i.e.*, how much was billed for the sales and how much was paid for the sales; also the number of goods sold, *e.g.*, the number of each of the goods listed on the trademark registration inquired about.

17. "And" and "or" shall be construed conjunctively or disjunctively, whichever makes the requests more inclusive. The term "all" shall mean "any and all," and the term "any" shall mean "any and all." The singular of any word or phrase shall include

the plural of such word or phrase, and the plural of any word or phrase shall include the singular of such word or phrase.

18. The terms "DOCUMENTS," "WRITINGS" or "RECORDINGS" as used herein are used in their broadest sense and include, without limitation, any type of written, recorded, electronic, graphic or photographic matter of any kind or character, however produced or reproduced, including but not limited to all photographs, sketches, drawings, videotapes, audiotapes, letters, telegrams, telexes, facsimiles, electronic mail, correspondence, brochures, manuals, press releases, transcripts of interviews, transcripts of speeches, product guides, contracts, consulting agreements, other agreements, business plans, deeds, drafts, workpapers, plans, blueprints, specifications, comparisons, surveys, data sheets, analyses, calculations, files (and their contents), notes to the files, reports, publications, mechanical and electronic sound recordings or transcripts thereof, calendar or diary entries, memoranda of telephone or personal conversations or of meetings or conferences, maps, studies, reports, charts, inter-office communications, minutes of meetings, articles, announcements, ledgers, vouchers, checks, receipts and invoices.

19. The term "COMMUNICATION" shall mean any oral or written transmittal, correspondence, and/or receipt of words or information, whether such was by chance, pre-arranged, formal or informal, including but not limited to conversations in person, telephone conversations, telegrams, telexes, facsimiles, letters, emails, reports or memoranda, formal statements, newspaper stories, notes of telephone conversations, notes of meetings, data compilations, and electronically stored data.

20. The terms "PERSON" or "PEOPLE" include any natural person, firm, association, organization, partnership, business, trust, corporation, or public entity.

21. The term "IDENTIFY," when employed with reference to a PERSON or to PEOPLE, means to provide at least the name, address, telephone number, facsimile number, website for that PERSON or PEOPLE, as far as available.

22. The terms "RELATE" or "REFER" mean directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon any one or more subject matters described in the discovery request.

INSTRUCTIONS

1. In response to the following DOCUMENT requests, REGISTRANT is requested to furnish any DOCUMENTS referred to below that are within the possession, custody or control of REGISTRANT, including without limitation, DOCUMENTS within the possession, custody or control of REGISTRANT's present or former attorneys, accountants, representatives, consultants, agents, employees, investigators, experts, or anyone else acting on REGISTRANT's behalf.

2. To the extent REGISTRANT withholds any information, DOCUMENTS, or portion thereof, because of a claim of privilege or immunity or otherwise, please provide a privilege log setting forth the general nature of the information, DOCUMENT or thing or portion thereof withheld, as well as any other information necessary for the Board's analysis of and ruling on REGISTRANT's privilege claim, including, without limitation, identifying the DOCUMENT(s) by date, names of author and recipient, subject matter, and the number of each of these Requests with respect to which such information is being withheld.

3. All DOCUMENTS should be produced in the same form and order in which they existed prior to production, including without limitation, in the manual, booklet, binder, file, folder, envelope, or other DOCUMENT or container in which they are ordinarily kept or maintained. If for any reason the container cannot be produced, REGISTRANT should produce copies of all labels or other identifying marking(s) thereon.

4. Electronic records and computerized information must be produced in an intelligible format or together with a description of the system form which they were derived sufficient to permit rendering the records and information intelligible.

5. Any comment, notation, or marking appearing on any DOCUMENT, and not a part of the original, is to be considered a separate DOCUMENT, and any draft, preliminary form, or superseded version of any DOCUMENT is also to be considered a separate DOCUMENT.

6. To the extent that REGISTRANT objects to any portion of any category of DOCUMENTS called for by any DOCUMENT request, REGISTRANT should produce all DOCUMENTS within each category to which REGISTRANT's objections do not apply.

7. Where a request asks for DOCUMENTS related to a specified subject, the lack of that subject shall also be encompassed within the request; for example, where a request asks for DOCUMENTS related to use of a trademark, the request shall be construed as also seeking DOCUMENTS related to non-use of that trademark.

8. The capitalization of words is used only as an aid and is not required for application of the definitions set out above.

REQUESTS FOR DOCUMENTS**REQUEST FOR PRODUCTION NO. 1:**

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 2:

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 3:

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 549 MARK for retail clothing boutiques.

REQUEST FOR PRODUCTION NO. 4:

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 5:

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 6:

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods through retail clothing boutiques under the 549 MARK.

REQUEST FOR PRODUCTION NO. 7:

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 8:

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps,

hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 9:

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before November 30, 2005, of the 549 MARK for retail clothing boutiques.

REQUEST FOR PRODUCTION NO. 10:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for handbags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 11:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tote bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 12:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for traveling bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 13:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoulder bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 14:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for clutch purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 15:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for all-purpose athletic bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 16:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for backpacks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 17:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for wallets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 18:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coin purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 19:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cosmetic bags sold empty before March 5, 2005.

REQUEST FOR PRODUCTION NO. 20:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bras before March 5, 2005.

REQUEST FOR PRODUCTION NO. 21:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for panties before March 5, 2005.

REQUEST FOR PRODUCTION NO. 22:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for slips before March 5, 2005.

REQUEST FOR PRODUCTION NO. 23:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for camisoles before March 5, 2005.

REQUEST FOR PRODUCTION NO. 24:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies before March 5, 2005.

REQUEST FOR PRODUCTION NO. 25:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for nightgowns before March 5, 2005.

REQUEST FOR PRODUCTION NO. 26:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pajamas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 27:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sleep shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 28:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for robes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 29:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 30:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for t-shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 31:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for skirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for swimwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 33:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bodysuits before March 5, 2005.

REQUEST FOR PRODUCTION NO. 34:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tap pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 35:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 36:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sarongs before March 5, 2005.

REQUEST FOR PRODUCTION NO. 37:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for garter belts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 38:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for stockings before March 5, 2005.

REQUEST FOR PRODUCTION NO. 39:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hosiery before March 5, 2005.

REQUEST FOR PRODUCTION NO. 40:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pantyhose before March 5, 2005.

REQUEST FOR PRODUCTION NO. 41:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for socks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 42:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for footwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 43:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 44:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for caps before March 5, 2005.

REQUEST FOR PRODUCTION NO. 45:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 46:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bandannas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 47:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for scarves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 48:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 49:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for jackets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 50:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for rainwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 51:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for gloves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 52:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for denim jeans before March 5, 2005.

REQUEST FOR PRODUCTION NO. 53:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tights before March 5, 2005.

REQUEST FOR PRODUCTION NO. 54:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies with garter belts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 55:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for handbags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 56:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tote bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 57:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for traveling bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 58:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoulder bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 59:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for clutch purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 60:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for all-purpose athletic bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 61:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for backpacks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 62:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for wallets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 63:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coin purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 64:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for cosmetic bags sold empty before March 5, 2005.

REQUEST FOR PRODUCTION NO. 65:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bras before March 5, 2005.

REQUEST FOR PRODUCTION NO. 66:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for panties before March 5, 2005.

REQUEST FOR PRODUCTION NO. 67:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for slips before March 5, 2005.

REQUEST FOR PRODUCTION NO. 68:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for camisoles before March 5, 2005.

REQUEST FOR PRODUCTION NO. 69:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies before March 5, 2005.

REQUEST FOR PRODUCTION NO. 70:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for nightgowns before March 5, 2005.

REQUEST FOR PRODUCTION NO. 71:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pajamas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 72:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sleep shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 73:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for robes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 74:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 75:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for t-shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 76:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for skirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 77:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for swimwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 78:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bodysuits before March 5, 2005.

REQUEST FOR PRODUCTION NO. 79:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tap pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 80:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 81:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sarongs before March 5, 2005.

REQUEST FOR PRODUCTION NO. 82:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for garter belts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 83:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for stockings before March 5, 2005.

REQUEST FOR PRODUCTION NO. 84:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hosiery before March 5, 2005.

REQUEST FOR PRODUCTION NO. 85:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pantyhose before March 5, 2005.

REQUEST FOR PRODUCTION NO. 86:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for socks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 87:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for footwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 88:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 89:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for caps before March 5, 2005.

REQUEST FOR PRODUCTION NO. 90:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 91:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bandannas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 92:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for scarves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 93:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 94:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for jackets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 95:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for rainwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 96:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for gloves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 97:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for denim jeans before March 5, 2005.

REQUEST FOR PRODUCTION NO. 98:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tights before March 5, 2005.

REQUEST FOR PRODUCTION NO. 99:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies with garters before March 5, 2005.

REQUEST FOR PRODUCTION NO. 100:

DOCUMENTS sufficient to show YOUR USE of the 549 MARK for retail clothing boutiques before November 30, 2005.

REQUEST FOR PRODUCTION NO. 101:

DOCUMENTS YOU referred to, used or relied on to answer any of PETITIONER's interrogatories to YOU.

REQUEST FOR PRODUCTION NO. 102:

Documents that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 103:

Documents that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits,

tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 104:

Documents that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 105:

Documents that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 106:

Documents that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 107:

Documents that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 108:

Documents that REFER to or RELATE to advertising in COMMERCE of any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION,

namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 109:

Documents that REFER to or RELATE to advertising in COMMERCE of any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 110:

Documents that REFER to or RELATE to advertising in COMMERCE of the 549 MARK.

REQUEST FOR PRODUCTION NO. 111:

All documents that REFER or RELATE to the PETITION.

REQUEST FOR PRODUCTION NO. 112:

All documents that REFER or RELATE to the ANSWER.

REQUEST FOR PRODUCTION NO. 113:

All documents that REFER or RELATE to any relief sought in the ANSWER.

REQUEST FOR PRODUCTION NO. 114:

All documents that REFER or RELATE to the allegations in paragraph numbered 13 in the ANSWER.

REQUEST FOR PRODUCTION NO. 115:

All documents that REFER or RELATE to the allegations in paragraph numbered 14 in the ANSWER.

REQUEST FOR PRODUCTION NO. 116:

All documents that REFER or RELATE to the allegations in paragraph numbered 15 in the ANSWER.

REQUEST FOR PRODUCTION NO. 117:

All documents that REFER or RELATE to the allegations in paragraph numbered 16 in the ANSWER.

REQUEST FOR PRODUCTION NO. 118:

All documents that REFER or RELATE to the allegations in paragraph numbered 17 in the ANSWER.

REQUEST FOR PRODUCTION NO. 119:

All documents that REFER or RELATE to the allegations in paragraph numbered 18 in the ANSWER.

REQUEST FOR PRODUCTION NO. 120:

All documents that REFER or RELATE to the allegations in paragraph numbered 19 in the ANSWER.

REQUEST FOR PRODUCTION NO. 121:

All documents that REFER or RELATE to the allegations in paragraph numbered 22 in the ANSWER.

REQUEST FOR PRODUCTION NO. 122:

All documents that REFER or RELATE to the allegations in paragraph numbered 23 in the ANSWER.

REQUEST FOR PRODUCTION NO. 123:

All documents that REFER or RELATE to the allegations in paragraph numbered 24 in the ANSWER.

REQUEST FOR PRODUCTION NO. 124:

All documents that REFER or RELATE to the allegations in paragraph numbered 25 in the ANSWER.

REQUEST FOR PRODUCTION NO. 125:

All documents that REFER or RELATE to the allegations in paragraph numbered 27 in the ANSWER.

REQUEST FOR PRODUCTION NO. 126:

All documents that REFER or RELATE to the allegations in paragraph numbered 29 in the ANSWER.

REQUEST FOR PRODUCTION NO. 127:

All documents that REFER or RELATE to the allegations in paragraph numbered 31 in the ANSWER.

REQUEST FOR PRODUCTION NO. 128:

All documents that REFER or RELATE to the allegations in paragraph numbered 33 in the ANSWER.

REQUEST FOR PRODUCTION NO. 129:

All documents that REFER or RELATE to the allegations in paragraph numbered 34 in the ANSWER.

REQUEST FOR PRODUCTION NO. 130:

All documents that REFER or RELATE to the allegations in paragraph numbered 35 in the ANSWER.

REQUEST FOR PRODUCTION NO. 131:

All documents that REFER or RELATE to the affirmative defenses in the ANSWER.

REQUEST FOR PRODUCTION NO. 132:

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 997 MARK.

REQUEST FOR PRODUCTION NO. 133:

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 241 MARK.

REQUEST FOR PRODUCTION NO. 134:

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 549 MARK.

REQUEST FOR PRODUCTION NO. 135:

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 997 MARK, including any negotiations or communications RELATING thereto.

REQUEST FOR PRODUCTION NO. 136:

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 241 MARK, including any negotiations or communications RELATING thereto.

REQUEST FOR PRODUCTION NO. 137:

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 549 MARK, including any negotiations or communications RELATING thereto.

REQUEST FOR PRODUCTION NO. 138:

All documents that REFER or RELATE to REGISTRANT's decision to oppose the PETITION, including memoranda, investigations, reports, opinions, and statements by third parties relied upon by REGISTRANT.

REQUEST FOR PRODUCTION NO. 139:

An electronic copy of each version and page of any website of REGISTRANT.

REQUEST FOR PRODUCTION NO. 140:

All documents that comprise, REFER to, RELATE to, or reflect upon any license agreement to which REGISTRANT is a party concerning any trademark.

REQUEST FOR PRODUCTION NO. 141:

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 997 MARK.

REQUEST FOR PRODUCTION NO. 142:

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 241 MARK.

REQUEST FOR PRODUCTION NO. 143:

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort,

or agreement to manufacture, market, sell or offer for sale any goods under the 549 MARK.

REQUEST FOR PRODUCTION NO. 144:

All documents that REFER to, RELATE to, or reflect upon each and every trademark license granted by REGISTRANT.

REQUEST FOR PRODUCTION NO. 145:

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 997 MARK.

REQUEST FOR PRODUCTION NO. 146:

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 241 MARK.

REQUEST FOR PRODUCTION NO. 147:

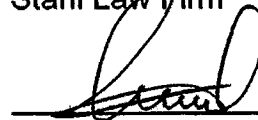
All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 549 MARK.

REQUEST FOR PRODUCTION NO. 148:

All documents REGISTRANT intends to use or may use at trial.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO REGISTRANT SAROJ INTERNATIONAL has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on August 2, 2007, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 707 Broadway Street, Suite 1800, San Diego, California 92101.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT L

TRADEMARK

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

LIVE VENTURES, INC.
Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.
Registrant.

CANCELLATION NO: 92047661

Registration No: 3143997

Registration No: 3147241

Registration No: 3158549

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
FIRST SUPPLEMENTAL
RESPONSE TO PETITIONER'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS**

I. General Objections

The following general objections are continuing in nature and shall apply to each Request and shall be incorporated into each response. Each individual Response is made subject to, and without waiver of, such general objection.

1. Saroj International, Inc.'s Responses herein are based upon the facts it knows at this time. Saroj International, Inc. may become aware of additional data, documentation and/or other and more specific facts which may be material to its Responses herein. Accordingly, Saroj International, Inc. reserves its rights to supplement or modify these Responses, in its sole discretion.

2. Saroj International, Inc. objects generally to the First Set as overly broad, unduly and oppressive insofar as Petitioner seeks to discover information about matters not relevant to the subject matter of this action, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, Saroj International, Inc. will respond to the extent the First Set is relevant to the subject matter of this action, or is reasonably calculated to lead to the discovery of admissible evidence.

3. Saroj International, Inc. objects generally to the First Set insofar as it may be construed as calling for the disclosure of material or information which is privileged and/or reflect attorney work product. To the extent Responses would include privileged or protected information, Saroj International, Inc. will not respond.

4. Saroj International, Inc. objects generally to the First Set as overly broad,

unduly burdensome, oppressive, vague, ambiguous and uncertain insofar as the instructions and definitions used in the First Set purport to impose obligations on Saroj International, Inc. beyond the scope of Rule 33. Without waiver of its objections, Saroj International, Inc. will respond consistent with the requirements of Rule 33.

5. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is not clearly identified or is not identified with sufficient particularity. Without waiver of its objections, Saroj International, Inc. has made reasonable interpretations of Petitioner's intended meanings, and will respond accordingly to such interpretations as set forth below.

6. Saroj International, Inc. objects generally to the First Set to the extent that does not specify a time period for any of the information sought.

7. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is keenly proprietary and represents trade secret information under State and Federal Law including the Uniform Trades Secrets Act, the disclosure of which will not be made unless a suitable Protective Order is in place.

II. Responses to Requests for Production

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first

USE of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and

cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 549 MARK for retail clothing boutiques.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically #2-34, 42-49, and 56-83. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 5

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods through retail clothing boutiques under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 7

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its

duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 8

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 9

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before November 30, 2005, of the 549 MARK for retail clothing boutiques.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tote bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 12

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 13

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 14

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 15

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 16

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 17

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 18

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 19

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 20

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bras

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 21

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 22

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 23

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for t-shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for skirts

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 34

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 38

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 39

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 40

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 41

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for socks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for

footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 43

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 44

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 45

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 47

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 48

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cots before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 49

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 50

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 51

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 52

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for denim jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 53

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tights

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 54

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies with garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 55

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 56

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tote bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 57

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 58

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 59

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 60

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 61

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 62

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 63

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for

cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 65

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bras before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 66

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 67

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 68

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 69

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 70

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 71

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 72

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 73

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 74

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 75

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for t-shirts

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 76

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 77

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 78

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 79

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 80

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 81

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 82

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 83

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 84

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 85

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 86

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for socks

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 87

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 88

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 89

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 90

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 91

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 92

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 93

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 94

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 95

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 96

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 97

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for denim

jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 98

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tights before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 99

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies with garters before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 100

DOCUMENTS sufficient to show YOUR USE of the 549 MARK for retail clothing boutiques before November 30, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 101

DOCUMENTS YOU referred to, used or relied on to answer any of PETITIONER'S interrogatories to YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 102

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 997 MARK for each

and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 103

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote

bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 104

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter

belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 105

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 106

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 106:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no

such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 107

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 107:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 108

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 997 MARK for each and all of the goods listed in the 997 REIGSTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 108:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 241 MARK for each and all of the goods listed in the 241 REIGSTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear,

bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 109:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 110

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 110:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 111

All documents that REFER or RELATE to the PETITION.

RESPONSE TO REQUEST FOR PRODUCTION NO. 111:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 112

All documents that REFER or RELATE to the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 112:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 113

All documents that REFER or RELATE to any relief sought in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 113:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some

documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 114

All documents that REFER or RELATE to the allegations in paragraph numbered 13 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 114:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 115

All documents that REFER or RELATE to the allegations in paragraph numbered 14 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 115:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses

under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 116

All documents that REFER or RELATE to the allegations in paragraph numbered 15 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 116:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 117

All documents that REFER or RELATE to the allegations in paragraph numbered 16 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 117:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. . Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 118

All documents that REFER or RELATE to the allegations in paragraph numbered 17 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 118:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 119

All documents that REFER or RELATE to the allegations in paragraph numbered 18 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 119:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time which would be related to Petitioner's allegations that Saroj International, Inc.'s '549 Registration and Petitioner's '708 Application are in the same trade channels. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 120

All documents that REFER or RELATE to the allegations in paragraph numbered 19 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 120:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 121

All documents that REFER or RELATE to the allegations in paragraph numbered 22 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 121:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 122

All documents that REFER or RELATE to the allegations in paragraph numbered 23 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 122:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 123

All documents that REFER or RELATE to the allegations in paragraph numbered 24 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 123:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 124

All documents that REFER or RELATE to the allegations in paragraph numbered 25 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 124:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 125

All documents that REFER or RELATE to the allegations in paragraph numbered 27 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 125:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 126

All documents that REFER or RELATE to the allegations in paragraph numbered 29 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 126:

Saroj International, Inc. has made a diligent search and reasonable inquiry

has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 127

All documents that REFER or RELATE to the allegations in paragraph numbered 31 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 127:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 128

All documents that REFER or RELATE to the allegations in paragraph numbered 33 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 128:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such

supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 129

All documents that REFER or RELATE to the allegations in paragraph numbered 34 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 129:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 130

All documents that REFER or RELATE to the allegations in paragraph numbered 35 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 130:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 131

All documents that REFER or RELATE to the affirmative defenses in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 131:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 132

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 132:

Saroj International, Inc. continues its objections to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 133

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 133:

Saroj International, Inc. continues its objections to this Request as it seeks to discover documents which would be privileged and/or confidential and not

subject to discovery.

REQUEST FOR PRODUCTION NO. 134

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 134:

Saroj International, Inc. continues its objections to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 135

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 997 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 135:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 136

All documents that REFER or RELATE to any past or present, actual,

planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 241 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 136:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 137

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 549 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 137:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 138

All documents that REFER or RELATE to REGISTRANT's decision to

oppose the PETITION, including memoranda, investigations, reports, opinions, and statements by third parties relied upon by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 138:

Saroj International, Inc. continues its objection to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 139

An electronic copy of each version and page of any website of REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 139:

Saroj International, Inc. will produce a document or documents responsive to this Request. See documents produced bearing Bates Stamp #0002.

REQUEST FOR PRODUCTION NO. 140

All documents that comprise, REFER to, RELATE to, or reflect upon any license agreement to which REGISTRANT is a party concerning any trademark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 140:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 141

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 141:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 142

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 142:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 143

All documents that REFER to, RELATE to, or reflect upon any attempts by

REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 143:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 144

All documents that REFER to, RELATE to, or reflect upon each and every trademark license granted by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 144:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 145

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 145:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 146

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 146:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 147

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 147:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 148


All documents REGISTRANT intends to use or may use at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 148:

Saroj International, Inc. has made a diligent search and reasonable inquiry

has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Dated: September 20, 2007

By: 
Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

Certification

I, Jaivin Karnani, am authorized on behalf of Saroj International, Inc., to provide responses to the above Requests for Admissions. The above responses are made following reasonable inquiry and investigation. I swear under the penalty of perjury that the above is true and correct.

Dated: September 20, 2007



Jaivin Karnani

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing FIRST SUPPLEMENTAL Response to First Set of Requests for Production has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on September 20 2007 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWSWEET LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: September 20, 2007

By: 

Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT M

TRADEMARK

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

LIVE VENTURES, INC.

Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.

Registrant.

CANCELLATION NO: 92047661

Registration No: 3143997

Registration No: 3147241

Registration No: 3158549

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
SECOND SUPPLEMENTAL
RESPONSE TO PETITIONER'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS**

I. Responses to Requests for Production

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Saroj International, Inc. has previously produced some documentation responsive to Request No. 4 to show orders placed for merchandise and quantities order. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 5

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags,

clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Saroj International, Inc. has previously produced some documentation responsive to Request No. 5 to show orders placed for merchandise and quantities order. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods through retail clothing boutiques under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Saroj International, Inc. has previously produced some documentation responsive to Request No. 6 to show orders placed for merchandise and quantities order. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 7

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 997 MARK for each and all of

the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Saroj International, Inc. has previously produced some documentation responsive to this Request to show the use of the 997 MARK. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 8

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats,

bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Saroj International, Inc. has previously produced some documentation responsive to this Request to show the use of the 241 MARK. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tote bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 12

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 13

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 14

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 15

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 16

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 17

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 18

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 19

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

No documents responsive to this Request exist.

REQUEST FOR PRODUCTION NO. 20

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bras before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 21

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for
panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Saroj International, Inc. has previously produced some documentation
responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 22

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for
slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Saroj International, Inc. has previously produced some documentation
responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 23

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for
camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Saroj International, Inc. has previously produced some documentation
responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for
teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for t-shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for

swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 34

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for

sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 38

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 39

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 40

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 41

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for socks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 43

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 44

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 45

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 47

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 48

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cots before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 49

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 50

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 51

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 52

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for

denim jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 53

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for
tights before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 54

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for
teddies with garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Saroj International, Inc. has previously produced some documentation
responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 55

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for
handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 56

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tote

bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 57

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 58

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 59

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 60

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 61

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 62

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 63

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 65

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bras before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents

exist.REQUEST FOR PRODUCTION NO. 66

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

.REQUEST FOR PRODUCTION NO. 67

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 68

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for

camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 69

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 70

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 71

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Saroj International, Inc. has previously produced some documentation

responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 72

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 73

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 74

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 75

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for t-shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 76

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 77

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 78

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 79

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 80

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 81

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 82

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 83

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 84

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 85

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 86

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for socks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 87

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 88

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 89

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 90

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 91

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 92

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 93

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 94

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 95

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 96

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for

gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 97

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for denim jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 98

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tights before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 99

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies with garters before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 100

DOCUMENTS sufficient to show YOUR USE of the 549 MARK for

retail clothing boutiques before November 30, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 101

DOCUMENTS YOU referred to, used or relied on to answer any of PETITIONER'S interrogatories to YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 102

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 103

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 104

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote

bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 105

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 106

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 106:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 107

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote

bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 107:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 108

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 108:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 109:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 110

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 110:

Saroj International, Inc. has previously produced some documentation

responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 111

All documents that REFER or RELATE to the PETITION.

RESPONSE TO REQUEST FOR PRODUCTION NO. 111:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 112

All documents that REFER or RELATE to the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 112:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 113

All documents that REFER or RELATE to any relief sought in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 113:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 114

All documents that REFER or RELATE to the allegations in paragraph numbered 13 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 114:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 115

All documents that REFER or RELATE to the allegations in paragraph numbered 14 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 115:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 116

All documents that REFER or RELATE to the allegations in paragraph numbered 15 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 116:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 117

All documents that REFER or RELATE to the allegations in paragraph numbered 16 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 117:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 118

All documents that REFER or RELATE to the allegations in paragraph numbered 17 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 118:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 119

All documents that REFER or RELATE to the allegations in paragraph numbered 18 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 119:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 120

All documents that REFER or RELATE to the allegations in paragraph numbered 19 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 120:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 121

All documents that REFER or RELATE to the allegations in paragraph numbered 22 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 121:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 122

All documents that REFER or RELATE to the allegations in paragraph numbered 23 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 122:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 123

All documents that REFER or RELATE to the allegations in paragraph numbered 24 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 123:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 124

All documents that REFER or RELATE to the allegations in paragraph numbered 25 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 124:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 125

All documents that REFER or RELATE to the allegations in paragraph numbered 27 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 125:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 126

All documents that REFER or RELATE to the allegations in paragraph numbered 29 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 126:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 127

All documents that REFER or RELATE to the allegations in paragraph numbered 31 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 127:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 128

All documents that REFER or RELATE to the allegations in paragraph numbered 33 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 128:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 129

All documents that REFER or RELATE to the allegations in paragraph numbered 34 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 129:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 130

All documents that REFER or RELATE to the allegations in paragraph numbered 35 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 130:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 131

All documents that REFER or RELATE to the affirmative defenses in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 131:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 132

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 132:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 133

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 133:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 134

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 134:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 135

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 997 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 135:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 136

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 241 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 136:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 137

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between

REGISTRANT and any third party RELATED to the 549 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 137:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 138

All documents that REFER or RELATE to REGISTRANT's decision to oppose the PETITION, including memoranda, investigations, reports, opinions, and statements by third parties relied upon by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 138:

Saroj International, Inc. continues its objection to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery. No responsive documentation exists.

REQUEST FOR PRODUCTION NO. 139

An electronic copy of each version and page of any website of REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 139:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 140

All documents that comprise, REFER to, RELATE to, or reflect upon

any license agreement to which REGISTRANT is a party concerning any trademark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 140:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 141

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 141:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 142

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 142:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 143

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 143:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 144

All documents that REFER to, RELATE to, or reflect upon each and every trademark license granted by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 144:

No responsive documents exist.

REQUEST FOR PRODUCTION NO. 145

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 145:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 146

All documents REFERRING or RELATING to any of REGISTRANT's

marketing programs or plans regarding goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 146:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

REQUEST FOR PRODUCTION NO. 147

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 147:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.


REQUEST FOR PRODUCTION NO. 148

All documents REGISTRANT intends to use or may use at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 148:

Saroj International, Inc. has previously produced some documentation responsive to this Request. No additional responsive documents exist.

Dated: March 18, 2008

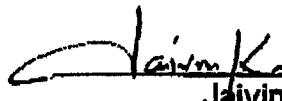
By: 
Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

Certification

I, Jaivin Karnani, am an Officer of Saroj International, Inc., and in that capacity, have provided responses to the above Requests for Documents. The above responses are made following reasonable inquiry and investigation. I swear under the penalty of perjury that the above is true and correct.

Dated: March 17, 2008


Jaivin Karnani

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing SECOND SUPPLEMENTAL Response to First Set of Requests for Production has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on March 18 2008 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWSWEET LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: March 18, 2008

By: _____



Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT N

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

Registration No.: 3147241
For the mark: east13
Date registered: September 26, 2006

Registration No.: 3158549
For the mark: East Thirteen
Date registered: October 17, 2006

LIVE VENTURES INC.

PETITIONER,

v.

SAROJ INTERNATIONAL, INC.

REGISTRANT.

CANCELLATION No. 92047661

**PETITIONER'S FIRST SET OF REQUESTS FOR
ADMISSIONS TO REGISTRANT SAROJ INTERNATIONAL**

Pursuant to Federal Rule of Civil Procedure 36, petitioner Live Ventures Inc. ("Petitioner") hereby requests that registrant Saroj International, Inc. ("Registrant") through one or more authorized officers or agents of Registrant, and in compliance with the definitions and instructions herein, answer separately and under oath the requests for admissions set forth below within thirty (30) days after the service of the requests.

DEFINITIONS

1. "REGISTRANT," "YOU" or "YOUR" means Saroj International, Inc., registrant and owner of U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549, and any person or entity that has used or uses any one or more of the trademarks under U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549 with authorization from Saroj International, Inc.

2. "PETITIONER" means Live Ventures Inc., petitioner in the captioned cancellation proceeding.

3. "997 MARK" means the trademark WWW.EAST13.COM under U.S. Trademark Registration No. 3143997.

4. "997 REGISTRATION" means U.S. Trademark Registration No. 3143997.

5. "241 MARK" means the trademark EAST13 under U.S. Trademark Registration No. 3147241.

6. "241 REGISTRATION" means U.S. Trademark Registration No. 3147241.

7. "549 MARK" means the trademark EAST THIRTEEN under U.S. Trademark Registration No. 3158549.

8. "549 REGISTRATION" means U.S. Trademark Registration No. 3158549.

9. "PETITION" means the Petition to Cancel filed by Petitioner in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

10. "ANSWER" means the Answer filed by REGISTRANT in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

11. "USE," when employed with reference to a trademark, means the use of the trademark in accordance with 15 U.S.C. § 1051(a).

12. "COMMERCE," when employed with reference to a trademark or products under a trademark, means commerce in accordance with 15 U.S.C. § 1127.

13. "USE IN COMMERCE," when employed with reference to a trademark or products under a trademark, means use in commerce in accordance with 15 U.S.C. § 1127.

14. "NATURE" of use of a trademark means how the trademark was used, e.g., was the trademark used on a product, in a brochure, in a website, in a letter, or in any other way.

15. "DATE" of use of a trademark means the day, month and year of the use, or as much of that information as possible.

16. "VOLUME OF SALES" means the dollar amount of sales, *i.e.*, how much was billed for the sales and how much was paid for the sales; also the number of goods sold, e.g., the number of each of the goods listed on the trademark registration inquired about.

17. "And" and "or" shall be construed conjunctively or disjunctively, whichever makes the requests more inclusive. The term "all" shall mean "any and all," and the term "any" shall mean "any and all." The singular of any word or phrase shall include

the plural of such word or phrase, and the plural of any word or phrase shall include the singular of such word or phrase.

18. The terms "DOCUMENTS," "WRITINGS" or "RECORDINGS" as used herein are used in their broadest sense and include, without limitation, any type of written, recorded, electronic, graphic or photographic matter of any kind or character, however produced or reproduced, including but not limited to all photographs, sketches, drawings, videotapes, audiotapes, letters, telegrams, telexes, facsimiles, electronic mail, correspondence, brochures, manuals, press releases, transcripts of interviews, transcripts of speeches, product guides, contracts, consulting agreements, other agreements, business plans, deeds, drafts, workpapers, plans, blueprints, specifications, comparisons, surveys, data sheets, analyses, calculations, files (and their contents), notes to the files, reports, publications, mechanical and electronic sound recordings or transcripts thereof, calendar or diary entries, memoranda of telephone or personal conversations or of meetings or conferences, maps, studies, reports, charts, inter-office communications, minutes of meetings, articles, announcements, ledgers, vouchers, checks, receipts and invoices.

19. The term "COMMUNICATION" shall mean any oral or written transmittal, correspondence, and/or receipt of words or information, whether such was by chance, pre-arranged, formal or informal, including but not limited to conversations in person, telephone conversations, telegrams, telexes, facsimiles, letters, emails, reports or memoranda, formal statements, newspaper stories, notes of telephone conversations, notes of meetings, data compilations, and electronically stored data.

20. The terms "PERSON" or "PEOPLE" include any natural person, firm, association, organization, partnership, business, trust, corporation, or public entity.

21. The term "IDENTIFY," when employed with reference to a PERSON or to PEOPLE, means to provide at least the name, address, telephone number, facsimile number, website for that PERSON or PEOPLE, as far as available.

22. The terms "RELATE" or "REFER" mean directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon any one or more subject matters described in the discovery request.

INSTRUCTIONS

A. Each request for admission must be responded to separately, fully, in writing, under oath.

B. If you object to answering a request for admission, in whole or in part, state your objections and reasons for not responding, and state all factual and legal justifications that you believe support the objection or failure to answer. If you object to answering only part of a request for admission, specify the part to which you object and respond to the remainder.

C. If you object to a request for admission on the grounds that it calls for information that is privileged or otherwise protected from discovery, state the basis for the claim of privilege or protection, and identify each person who participated in the privileged communication, the date of the communication, the form of the communication (written or oral), and its subject matter.

D. The capitalization of words is used only as an aid and is not required for application of the definitions set out above.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that YOU did not USE the 997 MARK for handbags before March 5, 2005.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU did not USE the 997 MARK for tote bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU did not USE the 997 MARK for traveling bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 4:

Admit that YOU did not USE the 997 MARK for shoulder bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU did not USE the 997 MARK for clutch purses before March 5, 2005.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU did not USE the 997 MARK for all-purpose athletic bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 7:

Admit that YOU did not USE the 997 MARK for backpacks before March 5, 2005.

REQUEST FOR ADMISSION NO. 8:

Admit that YOU did not USE the 997 MARK for wallets before March 5, 2005.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU did not USE the 997 MARK for coin purses before March 5, 2005.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU did not USE the 997 MARK for cosmetic bags sold empty before March 5, 2005.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU did not USE the 997 MARK for bras before March 5, 2005.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU did not USE the 997 MARK for panties before March 5, 2005.

REQUEST FOR ADMISSION NO. 13:

Admit that YOU did not USE the 997 MARK for slips before March 5, 2005.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU did not USE the 997 MARK for camisoles before March 5, 2005.

REQUEST FOR ADMISSION NO. 15:

Admit that YOU did not USE the 997 MARK for teddies before March 5, 2005.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU did not USE the 997 MARK for nightgowns before March 5, 2005.

REQUEST FOR ADMISSION NO. 17:

Admit that YOU did not USE the 997 MARK for pajamas before March 5, 2005.

REQUEST FOR ADMISSION NO. 18:

Admit that YOU did not USE the 997 MARK for sleep shirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 19:

Admit that YOU did not USE the 997 MARK for robes before March 5, 2005.

REQUEST FOR ADMISSION NO. 20:

Admit that YOU did not USE the 997 MARK for shirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 21:

Admit that YOU did not USE the 997 MARK for t-shirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 22:

Admit that YOU did not USE the 997 MARK for skirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 23:

Admit that YOU did not USE the 997 MARK for swimwear before March 5, 2005.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU did not USE the 997 MARK for bodysuits before March 5, 2005.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU did not USE the 997 MARK for tap pants before March 5, 2005.

REQUEST FOR ADMISSION NO. 26:

Admit that YOU did not USE the 997 MARK for pants before March 5, 2005.

REQUEST FOR ADMISSION NO. 27:

Admit that YOU did not USE the 997 MARK for sarongs before March 5, 2005.

REQUEST FOR ADMISSION NO. 28:

Admit that YOU did not USE the 997 MARK for garter belts before March 5, 2005.

REQUEST FOR ADMISSION NO. 29:

Admit that YOU did not USE the 997 MARK for stockings before March 5, 2005.

REQUEST FOR ADMISSION NO. 30:

Admit that YOU did not USE the 997 MARK for hosiery before March 5, 2005.

REQUEST FOR ADMISSION NO. 31:

Admit that YOU did not USE the 997 MARK for pantyhose before March 5, 2005.

REQUEST FOR ADMISSION NO. 32:

Admit that YOU did not USE the 997 MARK for socks before March 5, 2005.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU did not USE the 997 MARK for footwear before March 5, 2005.

REQUEST FOR ADMISSION NO. 34:

Admit that YOU did not USE the 997 MARK for shoes before March 5, 2005.

REQUEST FOR ADMISSION NO. 35:

Admit that YOU did not USE the 997 MARK for caps before March 5, 2005.

REQUEST FOR ADMISSION NO. 36:

Admit that YOU did not USE the 997 MARK for hats before March 5, 2005.

REQUEST FOR ADMISSION NO. 37:

Admit that YOU did not USE the 997 MARK for bandannas before March 5, 2005.

REQUEST FOR ADMISSION NO. 38:

Admit that YOU did not USE the 997 MARK for scarves before March 5, 2005.

REQUEST FOR ADMISSION NO. 39:

Admit that YOU did not USE the 997 MARK for coats before March 5, 2005.

REQUEST FOR ADMISSION NO. 40:

Admit that YOU did not USE the 997 MARK for jackets before March 5, 2005.

REQUEST FOR ADMISSION NO. 41:

Admit that YOU did not USE the 997 MARK for rainwear before March 5, 2005.

REQUEST FOR ADMISSION NO. 42:

Admit that YOU did not USE the 997 MARK for gloves before March 5, 2005.

REQUEST FOR ADMISSION NO. 43:

Admit that YOU did not USE the 997 MARK for denim jeans before March 5, 2005.

REQUEST FOR ADMISSION NO. 44:

Admit that YOU did not USE the 997 MARK for tights before March 5, 2005.

REQUEST FOR ADMISSION NO. 45:

Admit that YOU did not USE the 997 MARK for teddies with garter belts before March 5, 2005.

REQUEST FOR ADMISSION NO. 46:

Admit that YOU did not USE the 241 MARK for handbags before March 5, 2005.

REQUEST FOR ADMISSION NO. 47:

Admit that YOU did not USE the 241 MARK for tote bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 48:

Admit that YOU did not USE the 241 MARK for traveling bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 49:

Admit that YOU did not USE the 241 MARK for shoulder bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 50:

Admit that YOU did not USE the 241 MARK for clutch purses before March 5, 2005.

REQUEST FOR ADMISSION NO. 51:

Admit that YOU did not USE the 241 MARK for all-purpose athletic bags before March 5, 2005.

REQUEST FOR ADMISSION NO. 52:

Admit that YOU did not USE the 241 MARK for backpacks before March 5, 2005.

REQUEST FOR ADMISSION NO. 53:

Admit that YOU did not USE the 241 MARK for wallets before March 5, 2005.

REQUEST FOR ADMISSION NO. 54:

Admit that YOU did not USE the 241 MARK for coin purses before March 5, 2005.

REQUEST FOR ADMISSION NO. 55:

Admit that YOU did not USE the 241 MARK for cosmetic bags sold empty before March 5, 2005.

REQUEST FOR ADMISSION NO. 56:

Admit that YOU did not USE the 241 MARK for bras before March 5, 2005.

REQUEST FOR ADMISSION NO. 57:

Admit that YOU did not USE the 241 MARK for panties before March 5, 2005.

REQUEST FOR ADMISSION NO. 58:

Admit that YOU did not USE the 241 MARK for slips before March 5, 2005.

REQUEST FOR ADMISSION NO. 59:

Admit that YOU did not USE the 241 MARK for camisoles before March 5, 2005.

REQUEST FOR ADMISSION NO. 60:

Admit that YOU did not USE the 241 MARK for teddies before March 5, 2005.

REQUEST FOR ADMISSION NO. 61:

Admit that YOU did not USE the 241 MARK for nightgowns before March 5, 2005.

REQUEST FOR ADMISSION NO. 62:

Admit that YOU did not USE the 241 MARK for pajamas before March 5, 2005.

REQUEST FOR ADMISSION NO. 63:

Admit that YOU did not USE the 241 MARK for sleep shirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU did not USE the 241 MARK for robes before March 5, 2005.

REQUEST FOR ADMISSION NO. 65:

Admit that YOU did not USE the 241 MARK for shirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 66:

Admit that YOU did not USE the 241 MARK for t-shirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 67:

Admit that YOU did not USE the 241 MARK for skirts before March 5, 2005.

REQUEST FOR ADMISSION NO. 68:

Admit that YOU did not USE the 241 MARK for swimwear before March 5, 2005.

REQUEST FOR ADMISSION NO. 69:

Admit that YOU did not USE the 241 MARK for bodysuits before March 5, 2005.

REQUEST FOR ADMISSION NO. 70:

Admit that YOU did not USE the 241 MARK for tap pants before March 5, 2005.

REQUEST FOR ADMISSION NO. 71:

Admit that YOU did not USE the 241 MARK for pants before March 5, 2005.

REQUEST FOR ADMISSION NO. 72:

Admit that YOU did not USE the 241 MARK for sarongs before March 5, 2005.

REQUEST FOR ADMISSION NO. 73:

Admit that YOU did not USE the 241 MARK for garter belts before March 5, 2005.

REQUEST FOR ADMISSION NO. 74:

Admit that YOU did not USE the 241 MARK for stockings before March 5, 2005.

REQUEST FOR ADMISSION NO. 75:

Admit that YOU did not USE the 241 MARK for hosiery before March 5, 2005.

REQUEST FOR ADMISSION NO. 76:

Admit that YOU did not USE the 241 MARK for pantyhose before March 5, 2005.

REQUEST FOR ADMISSION NO. 77:

Admit that YOU did not USE the 241 MARK for socks before March 5, 2005.

REQUEST FOR ADMISSION NO. 78:

Admit that YOU did not USE the 241 MARK for footwear before March 5, 2005.

REQUEST FOR ADMISSION NO. 79:

Admit that YOU did not USE the 241 MARK for shoes before March 5, 2005.

REQUEST FOR ADMISSION NO. 80:

Admit that YOU did not USE the 241 MARK for caps before March 5, 2005.

REQUEST FOR ADMISSION NO. 81:

Admit that YOU did not USE the 241 MARK for hats before March 5, 2005.

REQUEST FOR ADMISSION NO. 82:

Admit that YOU did not USE the 241 MARK for bandannas before March 5, 2005.

REQUEST FOR ADMISSION NO. 83:

Admit that YOU did not USE the 241 MARK for scarves before March 5, 2005.

REQUEST FOR ADMISSION NO. 84:

Admit that YOU did not USE the 241 MARK for coats before March 5, 2005.

REQUEST FOR ADMISSION NO. 85:

Admit that YOU did not USE the 241 MARK for jackets before March 5, 2005.

REQUEST FOR ADMISSION NO. 86:

Admit that YOU did not USE the 241 MARK for rainwear before March 5, 2005.

REQUEST FOR ADMISSION NO. 87:

Admit that YOU did not USE the 241 MARK for gloves before March 5, 2005.

REQUEST FOR ADMISSION NO. 88:

Admit that YOU did not USE the 241 MARK for denim jeans before March 5, 2005.

REQUEST FOR ADMISSION NO. 89:

Admit that YOU did not USE the 241 MARK for tights before March 5, 2005.

REQUEST FOR ADMISSION NO. 90:

Admit that YOU did not USE the 241 MARK for teddies with garters before March 5, 2005.

REQUEST FOR ADMISSION NO. 91:

Admit that YOU did not USE the 549 MARK for retail clothing boutiques before November 30, 2005.

REQUEST FOR ADMISSION NO. 92:

Admit that YOU did not USE the 997 MARK for handbags before April 1, 2004.

REQUEST FOR ADMISSION NO. 93:

Admit that YOU did not USE the 997 MARK for tote bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 94:

Admit that YOU did not USE the 997 MARK for traveling bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 95:

Admit that YOU did not USE the 997 MARK for shoulder bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 96:

Admit that YOU did not USE the 997 MARK for clutch purses before April 1, 2004.

REQUEST FOR ADMISSION NO. 97:

Admit that YOU did not USE the 997 MARK for all-purpose athletic bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 98:

Admit that YOU did not USE the 997 MARK for backpacks before April 1, 2004.

REQUEST FOR ADMISSION NO. 99:

Admit that YOU did not USE the 997 MARK for wallets before April 1, 2004.

REQUEST FOR ADMISSION NO. 100:

Admit that YOU did not USE the 997 MARK for coin purses before April 1, 2004.

REQUEST FOR ADMISSION NO. 101:

Admit that YOU did not USE the 997 MARK for cosmetic bags sold empty before April 1, 2004.

REQUEST FOR ADMISSION NO. 102:

Admit that YOU did not USE the 997 MARK for bras before April 1, 2004.

REQUEST FOR ADMISSION NO. 103:

Admit that YOU did not USE the 997 MARK for panties before April 1, 2004.

REQUEST FOR ADMISSION NO. 104:

Admit that YOU did not USE the 997 MARK for slips before April 1, 2004.

REQUEST FOR ADMISSION NO. 105:

Admit that YOU did not USE the 997 MARK for camisoles before April 1, 2004.

REQUEST FOR ADMISSION NO. 106:

Admit that YOU did not USE the 997 MARK for teddies before April 1, 2004.

REQUEST FOR ADMISSION NO. 107:

Admit that YOU did not USE the 997 MARK for nightgowns before April 1, 2004.

REQUEST FOR ADMISSION NO. 108:

Admit that YOU did not USE the 997 MARK for pajamas before April 1, 2004.

REQUEST FOR ADMISSION NO. 109:

Admit that YOU did not USE the 997 MARK for sleep shirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 110:

Admit that YOU did not USE the 997 MARK for robes before April 1, 2004.

REQUEST FOR ADMISSION NO. 111:

Admit that YOU did not USE the 997 MARK for shirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 112:

Admit that YOU did not USE the 997 MARK for t-shirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 113:

Admit that YOU did not USE the 997 MARK for skirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 114:

Admit that YOU did not USE the 997 MARK for swimwear before April 1, 2004.

REQUEST FOR ADMISSION NO. 115:

Admit that YOU did not USE the 997 MARK for bodysuits before April 1, 2004.

REQUEST FOR ADMISSION NO. 116:

Admit that YOU did not USE the 997 MARK for tap pants before April 1, 2004.

REQUEST FOR ADMISSION NO. 117:

Admit that YOU did not USE the 997 MARK for pants before April 1, 2004.

REQUEST FOR ADMISSION NO. 118:

Admit that YOU did not USE the 997 MARK for sarongs before April 1, 2004.

REQUEST FOR ADMISSION NO. 119:

Admit that YOU did not USE the 997 MARK for garter belts before April 1, 2004.

REQUEST FOR ADMISSION NO. 120:

Admit that YOU did not USE the 997 MARK for stockings before April 1, 2004.

REQUEST FOR ADMISSION NO. 121:

Admit that YOU did not USE the 997 MARK for hosiery before April 1, 2004.

REQUEST FOR ADMISSION NO. 122:

Admit that YOU did not USE the 997 MARK for pantyhose before April 1, 2004.

REQUEST FOR ADMISSION NO. 123:

Admit that YOU did not USE the 997 MARK for socks before April 1, 2004.

REQUEST FOR ADMISSION NO. 124:

Admit that YOU did not USE the 997 MARK for footwear before April 1, 2004.

REQUEST FOR ADMISSION NO. 125:

Admit that YOU did not USE the 997 MARK for shoes before April 1, 2004.

REQUEST FOR ADMISSION NO. 126:

Admit that YOU did not USE the 997 MARK for caps before April 1, 2004.

REQUEST FOR ADMISSION NO. 127:

Admit that YOU did not USE the 997 MARK for hats before April 1, 2004.

REQUEST FOR ADMISSION NO. 128:

Admit that YOU did not USE the 997 MARK for bandannas before April 1, 2004.

REQUEST FOR ADMISSION NO. 129:

Admit that YOU did not USE the 997 MARK for scarves before April 1, 2004.

REQUEST FOR ADMISSION NO. 130:

Admit that YOU did not USE the 997 MARK for coats before April 1, 2004.

REQUEST FOR ADMISSION NO. 131:

Admit that YOU did not USE the 997 MARK for jackets before April 1, 2004.

REQUEST FOR ADMISSION NO. 132:

Admit that YOU did not USE the 997 MARK for rainwear before April 1, 2004.

REQUEST FOR ADMISSION NO. 133:

Admit that YOU did not USE the 997 MARK for gloves before April 1, 2004.

REQUEST FOR ADMISSION NO. 134:

Admit that YOU did not USE the 997 MARK for denim jeans before April 1, 2004.

REQUEST FOR ADMISSION NO. 135:

Admit that YOU did not USE the 997 MARK for tights before April 1, 2004.

REQUEST FOR ADMISSION NO. 136:

Admit that YOU did not USE the 997 MARK for teddies with garter belts before April 1, 2004.

REQUEST FOR ADMISSION NO. 137:

Admit that YOU did not USE the 241 MARK for handbags before April 1, 2004.

REQUEST FOR ADMISSION NO. 138:

Admit that YOU did not USE the 241 MARK for tote bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 139:

Admit that YOU did not USE the 241 MARK for traveling bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 140:

Admit that YOU did not USE the 241 MARK for shoulder bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 141:

Admit that YOU did not USE the 241 MARK for clutch purses before April 1, 2004.

REQUEST FOR ADMISSION NO. 142:

Admit that YOU did not USE the 241 MARK for all-purpose athletic bags before April 1, 2004.

REQUEST FOR ADMISSION NO. 143:

Admit that YOU did not USE the 241 MARK for backpacks before April 1, 2004.

REQUEST FOR ADMISSION NO. 144:

Admit that YOU did not USE the 241 MARK for wallets before April 1, 2004.

REQUEST FOR ADMISSION NO. 145:

Admit that YOU did not USE the 241 MARK for coin purses before April 1, 2004.

REQUEST FOR ADMISSION NO. 146:

Admit that YOU did not USE the 241 MARK for cosmetic bags sold empty before April 1, 2004.

REQUEST FOR ADMISSION NO. 147:

Admit that YOU did not USE the 241 MARK for bras before April 1, 2004.

REQUEST FOR ADMISSION NO. 148:

Admit that YOU did not USE the 241 MARK for panties before April 1, 2004.

REQUEST FOR ADMISSION NO. 149:

Admit that YOU did not USE the 241 MARK for slips before April 1, 2004.

REQUEST FOR ADMISSION NO. 150:

Admit that YOU did not USE the 241 MARK for camisoles before April 1, 2004.

REQUEST FOR ADMISSION NO. 151:

Admit that YOU did not USE the 241 MARK for teddies before April 1, 2004.

REQUEST FOR ADMISSION NO. 152:

Admit that YOU did not USE the 241 MARK for nightgowns before April 1, 2004.

REQUEST FOR ADMISSION NO. 153:

Admit that YOU did not USE the 241 MARK for pajamas before April 1, 2004.

REQUEST FOR ADMISSION NO. 154:

Admit that YOU did not USE the 241 MARK for sleep shirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 155:

Admit that YOU did not USE the 241 MARK for robes before April 1, 2004.

REQUEST FOR ADMISSION NO. 156:

Admit that YOU did not USE the 241 MARK for shirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 157:

Admit that YOU did not USE the 241 MARK for t-shirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 158:

Admit that YOU did not USE the 241 MARK for skirts before April 1, 2004.

REQUEST FOR ADMISSION NO. 159:

Admit that YOU did not USE the 241 MARK for swimwear before April 1, 2004.

REQUEST FOR ADMISSION NO. 160:

Admit that YOU did not USE the 241 MARK for bodysuits before April 1, 2004.

REQUEST FOR ADMISSION NO. 161:

Admit that YOU did not USE the 241 MARK for tap pants before April 1, 2004.

REQUEST FOR ADMISSION NO. 162:

Admit that YOU did not USE the 241 MARK for pants before April 1, 2004.

REQUEST FOR ADMISSION NO. 163:

Admit that YOU did not USE the 241 MARK for sarongs before April 1, 2004.

REQUEST FOR ADMISSION NO. 164:

Admit that YOU did not USE the 241 MARK for garter belts before April 1, 2004.

REQUEST FOR ADMISSION NO. 165:

Admit that YOU did not USE the 241 MARK for stockings before April 1, 2004.

REQUEST FOR ADMISSION NO. 166:

Admit that YOU did not USE the 241 MARK for hosiery before April 1, 2004.

REQUEST FOR ADMISSION NO. 167:

Admit that YOU did not USE the 241 MARK for pantyhose before April 1, 2004.

REQUEST FOR ADMISSION NO. 168:

Admit that YOU did not USE the 241 MARK for socks before April 1, 2004.

REQUEST FOR ADMISSION NO. 169:

Admit that YOU did not USE the 241 MARK for footwear before April 1, 2004.

REQUEST FOR ADMISSION NO. 170:

Admit that YOU did not USE the 241 MARK for shoes before April 1, 2004.

REQUEST FOR ADMISSION NO. 171:

Admit that YOU did not USE the 241 MARK for caps before April 1, 2004.

REQUEST FOR ADMISSION NO. 172:

Admit that YOU did not USE the 241 MARK for hats before April 1, 2004.

REQUEST FOR ADMISSION NO. 173:

Admit that YOU did not USE the 241 MARK for bandannas before April 1, 2004.

REQUEST FOR ADMISSION NO. 174:

Admit that YOU did not USE the 241 MARK for scarves before April 1, 2004.

REQUEST FOR ADMISSION NO. 175:

Admit that YOU did not USE the 241 MARK for coats before April 1, 2004.

REQUEST FOR ADMISSION NO. 176:

Admit that YOU did not USE the 241 MARK for jackets before April 1, 2004.

REQUEST FOR ADMISSION NO. 177:

Admit that YOU did not USE the 241 MARK for rainwear before April 1, 2004.

REQUEST FOR ADMISSION NO. 178:

Admit that YOU did not USE the 241 MARK for gloves before April 1, 2004.

REQUEST FOR ADMISSION NO. 179:

Admit that YOU did not USE the 241 MARK for denim jeans before April 1, 2004.

REQUEST FOR ADMISSION NO. 180:

Admit that YOU did not USE the 241 MARK for tights before April 1, 2004.

REQUEST FOR ADMISSION NO. 181:

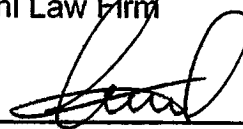
Admit that YOU did not USE the 241 MARK for teddies with garters before April 1, 2004.

REQUEST FOR ADMISSION NO. 182:

Admit that YOU did not USE the 549 MARK for retail clothing boutiques before October 1, 2005.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S FIRST SET OF REQUESTS FOR ADMISSIONS TO REGISTRANT SAROJ INTERNATIONAL has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on August 2, 2007, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 707 Broadway Street, Suite 1800, San Diego, California 92101.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT O

TRADEMARK

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

LIVE VENTURES, INC.

Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.

Registrant.

CANCELLATION NO: 92047661

Registration No: 3143997

Registration No: 3147241

Registration No: 3158549

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
FIRST SUPPLEMENTAL
RESPONSE TO PETITIONER'S FIRST SET OF REQUESTS FOR
ADMISSIONS**

I. General Objections

The following general objections are continuing in nature and shall apply to each Request and shall be incorporated into each response. Each individual Response is made subject to, and without waiver of, such general objection.

1. Saroj International, Inc.'s Responses herein are based upon the facts it knows at this time. Saroj International, Inc. may become aware of additional data, documentation and/or other and more specific facts which may be material to its Responses herein. Accordingly, Saroj International, Inc. reserves its rights to supplement or modify these Responses, in its sole discretion.

2. Saroj International, Inc. objects generally to the First Set as overly broad, unduly and oppressive insofar as Petitioner seeks to discover information about matters not relevant to the subject matter of this action, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, Saroj International, Inc. will respond to the extent the First Set is relevant to the subject matter of this action, or is reasonably calculated to lead to the discovery of admissible evidence.

3. Saroj International, Inc. objects generally to the First Set insofar as it may be construed as calling for the disclosure of material or information

which is privileged and/or reflect attorney work product. To the extent Responses would include privileged or protected information, Saroj International, Inc. will not respond.

4. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome, oppressive, vague, ambiguous and uncertain insofar as the instructions and definitions used in the First Set purport to impose obligations on Saroj International, Inc. beyond the scope of Rule 33. Without waiver of its objections, Saroj International, Inc. will respond consistent with the requirements of Rule 33.

5. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is not clearly identified or is not identified with sufficient particularity. Without waiver of its objections, Saroj International, Inc. has made reasonable interpretations of Petitioner's intended meanings, and will respond accordingly to such interpretations as set forth below.

6. Saroj International, Inc. objects generally to the First Set to the extent that does not specify a time period for any of the information sought.

7. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is keenly proprietary and represents trade secret information under State and Federal Law including the Uniform Trades Secrets Act, the disclosure of

which will not be made unless a suitable Protective Order is in place.

II. Responses to Requests for Admissions

REQUEST FOR ADMISSION NO. 1

Admit that YOU did not USE the 997 MARK for handbags before
March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 1

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 2

Admit that YOU did not USE the 997 MARK for tote bags before
March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 2

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 3

Admit that YOU did not USE the 997 MARK for traveling bags before
March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 3

Saroj International, Inc. admits the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 4

Admit that YOU did not USE the 997 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 4

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 5

Admit that YOU did not USE the 997 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 5

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 6

Admit that YOU did not USE the 997 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 6

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 7

Admit that YOU did not USE the 997 MARK for backpacks before

March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 7

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 8

Admit that YOU did not USE the 997 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 8

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 9

Admit that YOU did not USE the 997 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 9

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 10

Admit that YOU did not USE the 997 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 10

Saroj International, Inc. admits the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 11

Admit that YOU did not USE the 997 MARK for bras before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 11

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 12

Admit that YOU did not USE the 997 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 12

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 13

Admit that YOU did not USE the 997 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 13

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 14

Admit that YOU did not USE the 997 MARK for camisoles before

March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 14

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 15

Admit that YOU did not USE the 997 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 15

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 16

Admit that YOU did not USE the 997 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 16

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 17

Admit that YOU did not USE the 997 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 17

Saroj International, Inc. denies the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 18

Admit that YOU did not USE the 997 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 18

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 19

Admit that YOU did not USE the 997 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 19

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 20

Admit that YOU did not USE the 997 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 20

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 21

Admit that YOU did not USE the 997 MARK for t-shirts before March

5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 21

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 22

Admit that YOU did not USE the 997 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 22

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 23

Admit that YOU did not USE the 997 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 23

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 24

Admit that YOU did not USE the 997 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 24

Saroj International, Inc. admits the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 25

Admit that YOU did not USE the 997 MARK for tap pants before
March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 25

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 26

Admit that YOU did not USE the 997 MARK for pants before March 5,
2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 26

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 27

Admit that YOU did not USE the 997 MARK for sarongs before March
5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 27

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 28

Admit that YOU did not USE the 997 MARK for garter belts before

March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 28

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 29

Admit that YOU did not USE the 997 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 29

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 30

Admit that YOU did not USE the 997 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 30

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 31

Admit that YOU did not USE the 997 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 31

Saroj International, Inc. admits the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 32

Admit that YOU did not USE the 997 MARK for socks before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 32

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 33

Admit that YOU did not USE the 997 MARK for footwear before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 33

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 34

Admit that YOU did not USE the 997 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 34

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 35

Admit that YOU did not USE the 997 MARK for caps before March 5,

2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 35

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 36

Admit that YOU did not USE the 997 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 36

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 37

Admit that YOU did not USE the 997 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 37

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 38

Admit that YOU did not USE the 997 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 38

Saroj International, Inc. denies the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 39

Admit that YOU did not USE the 997 MARK for coats before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 39

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 40

Admit that YOU did not USE the 997 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 40

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 41

Admit that YOU did not USE the 997 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 41

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 42

Admit that YOU did not USE the 997 MARK for gloves before March

5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 42

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 43

Admit that YOU did not USE the 997 MARK for denim jeans before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 43

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 44

Admit that YOU did not USE the 997 MARK for tights before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 44

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 45

Admit that YOU did not USE the 997 MARK for teddies with garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 45

Saroj International, Inc. admits the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 46

Admit that YOU did not USE the 241 MARK for handbags before
March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 46

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 47

Admit that YOU did not USE the 241 MARK for tote bags before
March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 47

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 48

Admit that YOU did not USE the 241 MARK for traveling bags before
March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 48

Saroj International, Inc. admits the statement contained in this Request
for Admission.

REQUEST FOR ADMISSION NO. 49

Admit that YOU did not USE the 241 MARK for shoulder bags before

March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 49

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 50

Admit that YOU did not USE the 241 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 50

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 51

Admit that YOU did not USE the 241 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 51

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 52

Admit that YOU did not USE the 241 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 52

Saroj International, Inc. admits the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 53

Admit that YOU did not USE the 241 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 53

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 54

Admit that YOU did not USE the 241 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 54

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 55

Admit that YOU did not USE the 241 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 55

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 56

Admit that YOU did not USE the 241 MARK for bras before March 5,

2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 56

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 57

Admit that YOU did not USE the 241 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 57

Saroj International, Inc. denies the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 58

Admit that YOU did not USE the 241 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 58

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 59

Admit that YOU did not USE the 241 MARK for camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 59

Saroj International, Inc. denies the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 60

Admit that YOU did not USE the 241 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 60

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 61

Admit that YOU did not USE the 241 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 61

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 62

Admit that YOU did not USE the 241 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 62

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 63

Admit that YOU did not USE the 241 MARK for sleep shirts before

March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 63

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 64

Admit that YOU did not USE the 241 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 64

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 65

Admit that YOU did not USE the 241 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 65

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 66

Admit that YOU did not USE the 241 MARK for t-shirts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 66

Saroj International, Inc. admits the statement contained in this Request

for Admission.

REQUEST FOR ADMISSION NO. 67

Admit that YOU did not USE the 241 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 67

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 68

Admit that YOU did not USE the 241 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 68

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 69

Admit that YOU did not USE the 241 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 69

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 70

Admit that YOU did not USE the 241 MARK for tap pants before

March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 70

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 71

Admit that YOU did not USE the 241 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 71

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 72

Admit that YOU did not USE the 241 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 72

Saroj International, Inc. admits the statement contained in this Request for Admission.

REQUEST FOR ADMISSION NO. 73

Admit that YOU did not USE the 241 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR ADMISSION NO. 73

Saroj International, Inc. admits the statement contained in this Request